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Mike Foley CLERK OF COURTS MONTGOMERY COUNTY OHIO

IN THE COURT OF COMMON PLEAS MONTGOMERY COUNTY, OHIO

STATE OF OHIO ex rel. DAVE YOST Ohio Attorney General

Plaintiff,

v.

UNITED WHOLESALE MORTGAGE, LLC.

Defendant.

Case No.

COMPLAINT AND REQUEST FOR **DECLARATORY JUDGMENT,** INJUNCTIVE RELIEF, CONSUMER RESTITUTION, AND CIVIL PENALTIES

JURY TRIAL DEMANDED AND **ENDORSED HEREIN**

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Plaintiff, the State of Ohio, by and through its Attorney General, Dave Yost, (hereinafter "the State"), having reasonable cause to believe that violations of Ohio's consumer protection laws, violations of Ohio's Residential Mortgage Lending Act, and violations of Ohio's Corrupt Practices Act have occurred, alleges as follows:

INTRODUCTION

- 1. This case seeks to hold the largest wholesale mortgage lender in Ohio, Defendant United Wholesale Mortgage, LLC ("UWM"), accountable for orchestrating and executing a deliberate scheme to deceive thousands of Ohio homebuyers into paying millions of dollars in improper fees and excessive interest rates on their mortgages. This fraudulent scheme—and the illicit enterprise that UWM has assembled to perpetrate it—undermines the fundamental structure and purpose of the wholesale mortgage market in Ohio.
- 2. UWM and mortgage brokers market and advertise the wholesale channel as the best way for Ohio homebuyers to obtain affordable mortgages because, unlike in the retail channel, borrowers are supposedly represented by "independent" brokers who shop for the most competitive prices and rates. In reality, however, UWM does everything in its power to ensure that the mortgage brokers in its network are anything but "independent." Through a pattern of misrepresentations, deception, and unlawful inducements, UWM and loyalist brokers have conspired to funnel Ohio consumers into purchasing UWM home mortgage loans, which are materially more expensive than readily available alternatives, and to deprive consumers of the services they paid for from their mortgage brokers. As a result, UWM and its loyalist brokers have pilfered millions of dollars from the pockets of Ohio families.
- 3. The residential mortgage industry in Ohio is divided into two channels: retail and wholesale. Ohioans are likely most familiar with the retail channel, which constitutes the majority

of the overall mortgage market. The retail channel is comprised of numerous large national financial institutions such as Huntington, PNC, Bank of America, Citi, and many other household names. To obtain a mortgage through the retail channel, a prospective borrower contacts the financial institution and interacts with a loan officer who works for that specific institution. The loan officer provides the prospective borrower with options and pricing information about the mortgages offered only by that specific financial institution.

- 4. In the wholesale market, by contrast, the prospective borrower does not interact directly with lenders to shop and apply for a mortgage. Instead, the prospective borrower hires an "independent mortgage broker." Like with the retail channel, independent mortgage broker entities utilize loan officers. However, the duties and responsibilities for independent mortgage brokers and their loan officers are fundamentally different from loan officers in the retail channel. Unlike a loan officer who works for the lending bank, a mortgage broker and its affiliated loan officers are fiduciaries for the borrower. A broker's duties include ensuring its loan officers are surveying the pricing and options offered by a variety of wholesale lenders, presenting the information to the borrower, counseling the borrower regarding the available options, and helping the borrower complete and submit loan application paperwork to wholesale lenders. Brokers and their loan officers are compensated handsomely for their work on behalf of borrowers, with a fee up to 4% of the principal amount of the loan upon closing.
- 5. According to UWM, the core value proposition underlying the wholesale channel—as distinct from the retail channel—is the *independence* of mortgage brokers. Unlike a loan officer employed by a retail lender, an "independent" mortgage broker owes loyalty to the borrower, not the bank. Because the broker is not tied to any particular lending institution, the

broker can collect and present options from many different lenders to ensure the borrowers receive the most competitively priced options in their best financial interest.

6. Indeed, this distinction is the centerpiece of UWM's marketing to the public, which is aimed at convincing Ohioans to get their mortgages through the wholesale channel instead of the retail channel because "brokers are better." Here is how Mathew Ishbia, the Chief Executive Officer of UWM, describes the role of the mortgage broker:

"Mortgage brokers are completely independent. They are not captive or connected to my company or any company. They are independently shopping.... We really believe that the best place for a borrower to get a loan, that's at an independent mortgage broker. That's because the broker has access to multiple lenders instead of just one lender. If you are a banker, you have access to just your lender."

7. And here is Mathew Ishbia again extolling the benefits of the wholesale channel over the retail channel:

"Brokers have more products than any retail lender or big bank because they have access to multiple lenders. So if UWM has a unique product, brokers have access to that, just as they have access to Flagstar or Caliber's unique products. So being a broker gives you more product options, not less, because brokers have access to all lenders."²

8. And, here again, is Mathew Ishbia touting the ability of independent mortgage brokers to secure "lower rate[s]" by shopping across multiple lenders—including from UWM's

¹ Tracey Velt, *Transcript of Interview with Mat Ishbia*, Feb. 15, 2019, available at https://www.realtrends.com/articles/mat-ishbia-ceo-united-wholesale-mortgage/ (accessed Mar. 7, 2025).

² Kimberly Greene, *In order to grow, mortgage brokers need to know how to combat falsehoods*, Mortgage Professional America, Mar. 13, 2019, https://www.mpamag.com/us/mortgage-industry/business-growth/fighting-myths-one-at-a-time/162167 (accessed Mar. 7, 2025). All emphases are added unless otherwise noted.

competitors like Quicken (now called Rocket Mortgage)—to get a "cheaper" mortgage from whichever lender offers "the best deal":

"And so, what's going to take us to number one is really just educating consumers because when people realize the best way to get a mortgage is cheaper, faster, and easier to go to a mortgage broker. So go to findamortgagebroker.com. You find a local mortgage broker. And they shop. They send you to me at UWM, or to Quicken, or whoever the best deal for you is. But you get a lower rate."

9. Mathew Ishbia and other UWM executives repeatedly made similarly deceptive and misleading public statements that if borrowers hired a mortgage broker, the broker would shop across multiple lenders to identify savings on behalf of consumers:

"Ask the brokers out there how many lenders they work with. If there are less than five, then you have a problem. Right now, there are 70 lenders out there. One lender leaving, two others leaving, it doesn't matter at all. It's all about making sure [brokers] have options. As a broker, you have to have lenders competing at the same time for technology, service, partnership, price, and underwriting time. That's the benefit." (HousingWire.com interview with Mathew Ishbia, June 23, 2023).

"[W]hen consumers work with an independent mortgage broker, they typically save thousands of dollars, and almost always have a faster, more seamless and personalized experience." (UWM Press Release quoting Mathew Ishbia and urging consumers to visit UWM's mortgage referral website MortgageMatchup.com to find an "independent mortgage broker," Aug. 28, 2024).⁵

"There's all these different products that are out there, and having an independent [broker] is going to be able to help guide you and

³ *Interview with Mat Ishbia*, Yahoo! Finance Live, Dec. 4, 2020, https://www.facebook.com/MatIshbiaUWM/videos/1330920580574049/ (accessed Mar. 7, 2025).

⁴ Flávia Furlan Nunes, *Mat Ishbia talks the 'loser mentality,' the controversial 'ultimatum' and the years ahead*, Housing Wire, Jun. 2, 2023, https://preprod.housingwire.com/articles/mat-ishbia-talks-the-loser-mentality-the-controversial-ultimatum-and-the-years-ahead/ (accessed Mar. 7, 2025).

https://www.uwm.com/about-us/media-resources/press-releases/2024/august-28-2024/ (accessed Sep. 26, 2024).

make all of these products available to you versus just going into your bank or a retail online company that's only going to be 1 to 1, and you're only getting their products or services, their lead times, which is usually not going to be good for you." (Fox News Digital Interview with UWM CSO Alex Elezaj, Sep. 8, 2024).

"That is the real benefit of working with an independent broker. They work not just with UWM but they work with many other lenders, so that product for [you] and your family, you know, you're gonna have a lot more options by using an independent versus working with a captive loan officer at a bank or at a retail lender." (HousingWire Daily Podcast Interview with UWM CSO Alex Elezaj, July 9, 2024).

- 10. UWM not only knew that these statements were false or deceptive—since UWM knew that a substantial number of mortgage brokers were funneling nearly all borrowers to UWM without shopping—but UWM was also engaged in business practices to actively *prevent* brokers from shopping for the best rates on behalf of borrowers.
- 11. Thousands of so-called independent brokers echo UWM's deceptive representations to consumers as well. On their websites, social media pages, and direct communications with borrowers, brokers hold themselves out as "trusted guides" that "represent you, the customer, not the lender" and claim to shop across multiple lenders. As one broker website puts it:

"Mortgage Brokers represent you, the customer, not the lender. Because they are not employees of a lending institution, Brokers are not limited in the product they can offer you.... There is a wide assortment of options and features available to homebuyers today. Shopping around takes a lot of time and effort. The mortgage process within today's very competitive marketplace intimidates

⁶ Madeline Coggins, *Mortgage broker myths debunked: How securing a loan has become 'faster, cheaper and easier'*, FOX Business, Sep. 8, 2024, https://www.foxbusiness.com/media/mortgage-broker-myths-debunked-how-securing-loan-has-become-faster-cheaper-easier (accessed Mar. 7, 2025).

⁷ *UWM's Alex Elezaj on housing affordability and helping brokers in this market*, Housingwire Daily Podcast, https://www.housingwire.com/podcast/uwms-alex-elezaj-on-housing-affordability-and-helping-brokers-in-this-market/ (03:08-03:25) (accessed Mar. 7, 2025).

many homebuyers. It pays to work with a mortgage professional who will represent you and ensure the mortgage you get is the one best suited to your needs."8

- 12. In substance, however, this broker's marketing statement is reflective of boilerplate materials generated by UWM itself, which UWM disseminated to its network of loyalist brokers to amplify UWM's own public misrepresentations. UWM even provides brokers with templates for internet advertising to ensure they amplify and widely disseminate the uniform (but highly deceptive) message to the public that brokers in the wholesale mortgage channel will work independently on their behalf.
- 13. Unfortunately, this is all a giant put-on. While UWM proclaims "brokers are better" because they are "not captive or connected" to any one lender and instead "independently shop" to get borrowers the "best deal," UWM secretly works to ensure that brokers work on *UWM's* behalf, driving up borrower costs and UWM's profits. In pursuit of increased revenues and market share, UWM has corrupted hundreds of so-called "independent" mortgage brokers in Ohio to make them captive and connected to UWM, so that they do not "independently shop." This means borrowers do not get the "best deal." Instead, they get the UWM deal—no matter what—even if it is significantly more expensive, as it almost always is.
- 14. As a result of UWM's deceptive marketing and collusion with brokers, thousands of Ohio homebuyers have been duped. In reliance on misleading representations and fraudulent omissions made to the public by UWM and the Ohio brokers it has roped into its enterprise, thousands of Ohio borrowers entered the wholesale channel rather than the retail channel. Ohioans engaged mortgage brokers believing—as UWM falsely told them—that the brokers were "independent," and they provide the borrowers "independent" advice and representation to help

⁸ Edge Home Finance, https://edgehomefinance.com/about-us/ (accessed Mar. 7, 2025).

them obtain the most affordable and suitable mortgage loan available among multiple lenders. But instead, these thousands of unsuspecting borrowers did not obtain any such "independent" advice or representation. Rather, they were ensuared in UWM's scheme, and steered, without their knowledge, to UWM's higher-priced loans.

- The statistics are astonishing. Based on analysis of publicly available data from the Consumer Financial Protection Bureau's ("CFPB") Home Mortgage Disclosure Act Loan Application Register and Modified Loan/Application Data ("HMDA") and Deed of Trust records, over the past three years, UWM has issued nearly \$605 million in Ohio mortgages through purportedly "independent" brokers who refer 99% of their business to UWM. In 2023 alone, 50 so-called "independent" Ohio brokers funneled 99% or more of their mortgages to UWM, worth at least \$215 million. As of 2023, nearly half of all Ohio UWM mortgages were originated by brokers who refer 75% or more of their business to UWM. In short, these brokers are not "independent" and do not shop around to other lenders. They are not seeking the best prices for their clients. They are instead loyal to UWM. Through a series of intentional and illegal practices, UWM has corrupted a large swath of brokers and turned them into the functional equivalent of retail "loan officers" loyal to a single lender, UWM.
- 16. These corrupted brokers are, functionally, employees in the UWM enterprise. And thanks to a blizzard of intentional misrepresentations and material omissions from UWM and its broker partners, hundreds of thousands of Ohioans who financed their homes with UWM loans entered mortgage transactions under a false understanding. While these borrowers reasonably believed they had an independent mortgage broker who would prioritize *their* needs—*not UWM's*—in reality, by working with certain UWM-captive brokers, these borrowers were unknowingly predestined to get a UWM loan, even if it was not in their best interests.

- 17. The consequences for these UWM borrowers are significant. Not only were they deprived of the very "independent" representation that they sought (and paid for) in making one of the largest financial decisions of their lives, but UWM rarely offered the best available pricing throughout the past four years and routinely charged fees and costs that substantially exceeded their competitors' offerings.
- 18. UWM and its corrupted brokers have been richly rewarded for their unlawful practices, siphoning millions of dollars from Ohio consumers through inflated mortgage fees, costs, and rates. Ohio homebuyers are the unwitting victims in UWM's scheme to enrich itself. This action seeks to rectify UWM's cynical, destructive campaign to take advantage of Ohio consumers who sought exactly what UWM, its CEO Mathew Ishbia, and their corrupted brokers promised—"independent[] shopping," honest "access to multiple lenders instead of just one lender," and "the best deal" at the "lowest rate"—but who received exactly the opposite, costing them richly.

THE PARTIES

19. Ohio Attorney General Dave Yost brings this action for and on behalf of the sovereign State of Ohio and on behalf of its citizens in *parens patriae* to remedy harms to the people of the State of Ohio. The State of Ohio has a sovereign interest in the economic well-being of Ohio residents and in the maintenance and integrity of the mortgage lending market. Under statutory and common law, the Ohio Attorney General has the authority to file suits in the courts of Ohio to enforce the Ohio Consumer Sales Practices Act, R.C. 1345.01, et seq., ("CSPA") and to prevent and remedy fraud and corruption against the public interest.

20. Defendant UWM, formerly known as United Shore Financial Services, LLC, is a limited liability company formed in the state of Michigan with a principal place of business in Pontiac, Michigan.

JURISDICTION AND VENUE

- 21. This Court has subject matter jurisdiction over this action pursuant to R.C. 1322.40 (as to the Ohio Residential Mortgage Lending Act claim); R.C. 1345.04 (as to the Ohio Consumer Sales Practices Act claim) and R.C. 2923.34 (as to the Ohio Corrupt Practices Act claim).
- 22. The Court has personal jurisdiction over UWM because it conducts business in Ohio, purposefully direct or directed its actions toward Ohio, and/or has the requisite minimum contacts with Ohio necessary to permit the Court to exercise jurisdiction.
- 23. Venue is proper in Montgomery County pursuant to Ohio Civ. R. 3(C)(3) and (6). Each Defendant (1) engaged in activity in this County that gave rise to the claims for relief; and (2) all or part of the claim for relief arose in this County.

FACTUAL ALLEGATIONS

- I. Wholesale Mortgages, Unlike Retail Mortgages, Are Originated Through Third Party Intermediaries: "Independent" Mortgage Brokers
- 24. Residential mortgage loans in Ohio generally fall into one of two categories: retail and wholesale.
- 25. Retail mortgage loans are originated through a direct interaction between the prospective borrower and the lender. In the retail setting, the borrower approaches the lender directly and works with an in-house loan officer to (i) complete a loan application, (ii) consider the various mortgage products offered by the lender, and (iii) submit the necessary documentation for income verification and underwriting. The loan officer works for the lender and represents the lender's interests; the borrower represents his own interests. The entire loan-origination transaction

occurs within the corporate structure of the retail lender and the loan is closed using lender-supplied funds.⁹ As of 2023, direct-to-consumer mortgage loans account for nearly \$40 billion in loans for Ohioans.¹⁰ Major retail lenders include big banks (e.g., Huntington, PNC, and Bank of America), non-bank mortgage lenders (e.g., UWM), online non-bank mortgage lenders (i.e. LoanDepot), and credit unions (e.g., Navy Federal Credit Union).

- 26. The remaining \$4 billion of mortgage loans are originated through what is often called the "wholesale channel." Wholesale mortgage loans, unlike retail mortgage loans, are originated through a process that involves third-party intermediaries—a loan officer and an affiliated mortgage broker. 12
- 27. Instead of interacting directly with the lender to shop and apply for a loan, the prospective borrower hires a loan officer who (i) collects relevant information about the borrower's finances and the amount of the desired loan, (ii) surveys the wholesale market to determine what loan products and rates are available to the borrower from a variety of wholesale mortgage lenders, (iii) helps the borrower evaluate the options to select the loan with the best pricing, and (iv) together with an affiliated mortgage broker, communicates with the lender on the borrower's

⁹ See Loan Originator Compensation Requirements Under the Truth in Lending Act (Regulation Z), 78 FR 11280, 11284, https://www.federalregister.gov/documents/2013/02/15/2013-01503/loan-originator-compensation-requirements-under-the-truth-in-lending-act-regulation-z.

¹⁰ Inside Mortg. Fin., *First-Lien Mortgage Originations by Production Channel* (published Feb. 29, 2024), https://www.insidemortgagefinance.com/products/313551-originations-by-production-channel-2003-4q23-pdf.

¹¹Id. This channel is sometimes called the "third-party origination" or "TPO" channel as well.

¹² The definitions of loan officer and mortgage broker under Ohio law track the normal nationwide practice of loan officers handling the day-to-day interactions and paperwork with the borrower, and the mortgage broker existing as the entity that places loan applications with wholesale lenders. *See* R.C. 1345.01(H) (noting that the definition of loan officer includes mortgage loan originator as defined at section 1322.01) and (J).

behalf to complete the application and close the loan. Borrowers rely on the relationships and expertise of their broker to find and recommend the loan product that is most affordable and in turn, the broker holds a fiduciary duty to the borrowers.¹³

- 28. Upon closing, brokers receive compensation, typically in the form of a fee or commission equivalent to between 1% and 4% of the principal amount of the loan. Broker compensation is usually paid through the lender, though in some cases, the borrower may pay directly instead. Even when broker compensation is paid by the lender, however, borrowers often pay extra financing charges to the lender to cover the cost of broker compensation.
- 29. Independent mortgage brokers' conduct and compensation are subject to standards and limits prescribed by federal and state law. In the wake of the financial crisis of 2008, which was fueled in part by incentives that drove deceptive and reckless business practices by mortgage brokers, legislation at federal and state level sought to strengthen and codify rules concerning brokers' compensation and duties to their clients.
- 30. In Ohio, mortgage brokers owe a fiduciary duty to borrowers.¹⁴ In addition, Ohio statutes prohibit business practices that deceive, mislead, defraud, or are unfair toward consumers.¹⁵

¹³ Unless otherwise indicated, the term "broker" as used hereinafter refers collectively to mortgage brokers who operate in the wholesale channel and the individual loan officers who work with and for them.

¹⁴ See 10 Ohio Jur. 3d Brokers § 118 ("brokers owe fiduciary duties to their clients"); see also FV 1 Inc. v. Goodspeed, 2012-Ohio-3001, ¶ 34 (7th Dist.) ("A mortgage broker has a fiduciary duty to his or her client.").

¹⁵ See RC 1322.01-99 (imposing additional duties on mortgage brokers, including prohibitions on (1) any unfair, deceptive, or unconscionable acts, (2) false or misleading statements, or (3) conduct that constitutes dishonest dealings.).

31. Lenders like UWM are keenly aware of brokers' obligations to their borrowers under state and federal law. For instance, in its most recent Annual Report submitted to the Securities and Exchange Commission ("SEC"), UWM advises investors that brokers "are subject to parallel and separate legal obligations" and that "[w]hile these laws may not explicitly hold the originating lenders responsible for the legal violations of [brokers], U.S. federal and state agencies increasingly have sought to impose such liability." ¹⁶

II. According to UWM and Others, the Core Value Proposition of the Wholesale Channel Arises from the Mortgage Broker's "Independence" from the Lender

- 32. Borrowers who are interested in obtaining mortgages have a threshold decision to make: whether to enter the retail channel or the wholesale channel. UWM—and the brokers with which it has conspired—work to persuade prospective borrowers to enter the wholesale channel. The more borrowers that enter the wholesale channel, the more potential clients UWM and those brokers have in the market. By contrast, prospective borrowers who enter the retail channel cease to be a potential borrower for UWM or a client for wholesale brokers.
- 33. In view of this, UWM and the brokers with which it has conspired tout that a key distinguishing feature of entering the wholesale mortgage channel is that, in the wholesale channel, a borrower hires an independent mortgage broker who faithfully represents the borrower's best interests through the open-market process.
- 34. Purchasing a home is the most consequential financial transaction that most Ohioans will make. For many, the process can be overwhelming. Prospective borrowers that choose to enter the wholesale channel and hire mortgage brokers—rather than simply entering the retail market—do so because they are promised a trusted agent who will guide them through the

¹⁶ UWM 2023 Form 10-K at 15.

process and provide them confidence and security in connection with this important decision. The borrower pays for the assurance of the mortgage broker's "independence" and undivided loyalty.

- 35. When a borrower hires an independent broker, the borrower is paying for assuredness that the broker will honestly serve the borrower in an unconflicted manner, and that the broker does not maintain undisclosed relationships with lenders that limit, and/or that are designed to limit, the broker's ability to present competitive and affordable mortgage options.
- 36. As one UWM-funded industry trade group, the Association of Independent Mortgage Experts ("AIME"), has explained, the independence of the mortgage broker is essential from the borrower's perspective. For the borrower, the value of hiring an independent mortgage broker derives primarily from the broker's ability to "review loan offerings from different lenders to find the best option for borrowers" and to "negotiate with mortgage lenders to get the most competitive interest rates and pricing." If brokers are beholden to or conspire with a particular lender and do not independently represent the interests of their clients, borrowers are deprived of the entire purpose and economic benefit of the consumer transaction.

¹⁷ See Figure 1, Independent Mortgage Brokers Create Value for Homeowners Across America, AIME Infographic, https://aimegroup.com/wp-content/uploads/2022/07/AIME-Infographic-Print-Original-Format-1.pdf (accessed Mar. 7, 2025).

Figure 1

INDEPENDENT MORTGAGE BROKERS HELP BORROWERS ACHIEVE HOMEOWNERSHIP

Independent mortgage brokers are intermediaries matching borrowers and lenders. They provide valuable services to homeowners from the start to the end of the financing process.











EVALUATE NEEDS

Brokers meet with borrowers to discuss their needs, assess their financial situation, and educate them the mortgage loan process

RESEARCH OPTIONS

Brokers review loan offerings from different lenders to find the best option for borrowers to buy or refinance their homes

REPRESENT BORROWERS

Brokers represent borrowers and negotiate with mortgage lenders to get the most competitive interest rates and pricing

ASSIST WITH APPLICATIONS

Brokers assist borrowers with the loan application, including obtaining credit reports, verifying financials, and coordinating all of the paperwork

HELP TO CLOSE LOANS

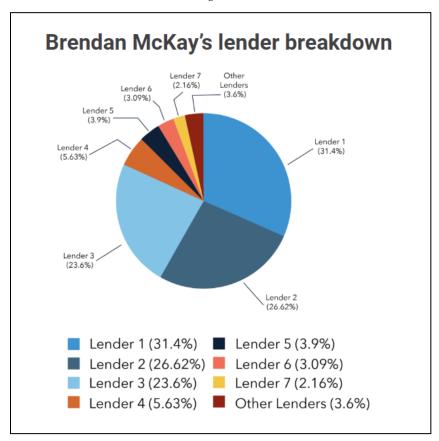
Brokers work with underwriters and closing agents to close loans on time

37. As AIME has explained: "One of the most important things for brokers, *and what makes them brokers*, is their ability to work with a variety of lenders." "In order to remain competitive in an increasingly competitive purchase environment, mortgage brokers need to provide an array of loan options from a variety of wholesale mortgage lenders to fully support the changing demographics of the American homeowner." AIME explains that independent brokers should distribute loans among at least seven different lenders, with no lender receiving more than 31.4% of the broker's loans. This position is reflected in Figure 2, a chart created by AIME, which depicts a proper distribution of loans across lenders for an independent broker; in this case, AIME's President of Broker Advocacy, Brendan McKay.¹⁹

¹⁸ How to Grow Your Brokerage by Diversifying Your Mortgage Lenders, AIME, Jul. 7, 2021, https://aimegroup.com/how-to-grow-your-brokerage-by-diversifying-your-mortgage-lenders/ (accessed Mar. 7, 2025).

¹⁹ Figure 2, *Id*.





- 38. of maintaining Mortgage brokers acknowledge the importance independence—or at least the appearance of independence—from any particular wholesale lender in the market. If borrowers knew that a broker was funneling loans to a particular lender, that broker would be at a huge competitive disadvantage because borrowers would flock to competitors who can tout their independence and lower rates. This is unsurprising: prospective borrowers who choose to enter the wholesale channel in the first place do so based on the advertised benefits and savings associated with having an independent broker working on their behalf. They do not enter the wholesale channel to hire a broker who operates in substantially the same way as a loan officer employed by a single lending institution like in the retail channel.
- 39. It is widely understood by consumers that the putative advantage of entering the wholesale channel is that brokers are not beholden to any lender. Rather, the "independence" of

mortgage brokers is meant to ensure they will shop across multiple lenders to find the borrower the best available loan. For example, industry experts and trade groups, including organizations funded by UWM, have said:

- a. "Brokers work for the borrower, not the bank. *Independent mortgage brokers have flexibility to shop rates from multiple lenders* with unmatched earning potential."²⁰
- b. "One of the most important things for brokers, and what makes them brokers, is their ability to work with a variety of lenders. Not only does that ability allow brokers to shop for the best price and process for their clients, but also allows them to handle unconventional loans. That optionality may be even more important as a more diverse and younger group of people begin looking for homes."²¹
- c. "Mortgage brokers are the matchmakers of the home-buying process. *They work on the homebuyer's behalf and shop multiple lenders to find the rates and terms that meet their clients' needs*. Mortgage brokers usually rely on their relationships with wholesale lenders ... who offer discounted rates that aren't available directly."²²
- d. "Typically, *brokers provide...[m]ore options to the consumer*, by enabling them to shop the market for the best price."²³
- e. "A mortgage broker works to connect home buyers or homeowners with the best mortgage rates possible....[W]ith a mortgage broker in your corner, you gain access to a wider network of lenders and that alone could pave the way to a really good deal."²⁴
- f. "If you're the type of shopper who always buys at the first store or gets overwhelmed by options, a bank or online lender may be best. If you want a

²⁰ Why Brokers Are Better, brokersarebetter.com, https://brokersarebetter.com/why-brokers-are-better/ (accessed Apr. 2, 2024).

²¹ How To Grow Your Brokerage By Diversifying Your Mortgage Lenders, AIME Group, Jul. 7, 2021, https://aimegroup.com/how-to-grow-your-brokerage-by-diversifying-your-mortgage-lenders/ (accessed Mar. 7, 2025).

Wholesale Mortgage vs Retail Mortgage: What's the Difference?, beamortgagebroker.com, Mar. 27, 2020, https://www.beamortgagebroker.com/blueprint-blog/wholesale-mortgage-vs-retail-mortgage (accessed Mar. 7, 2025).

²³ Mortgage 101: What's the Difference Between a Mortgage Broker and a Mortgage Banker?, AIME Group, https://aimegroup.com/wp-content/uploads/2022/07/AIME_Banker VsBroker.pdf (accessed Mar. 7, 2025).

²⁴ Maurie Backman, *What Is a Mortgage Broker*, The Ascent, Feb. 22, 2023, https://www.fool.com/the-ascent/mortgages/what-mortgage-broker/ (accessed Sep. 26, 2024).

mortgage veteran to shop loans and communicate with lenders on your behalf to find you the best rate (think lower monthly payments), you'll need to find a mortgage broker."²⁵

- 40. UWM routinely promotes, echoes, and amplifies the same messages concerning the critical importance of mortgage broker independence.
- 41. In particular, UWM's CEO Mathew Ishbia regularly and publicly touts mortgage brokers' ability to independently shop options from multiple lenders as a key reason why the "broker" channel is more beneficial than retail. For example, Mathew Ishbia has said:
 - a. "Mortgage brokers are completely independent. They are not captive or connected to my company or any company. They are independently shopping....We really believe that the best place for a borrower to get a loan, that's at an independent mortgage broker. That's because the broker has access to multiple lenders instead of just one lender. If you are a banker, you have access to just your lender."²⁶
 - b. "The broker versus banker, we're all originators out there trying to help consumers, which is great. We believe that options are better, more options are better than less and that's why we believe in the broker channel and that's why we've invested all of our time and effort in trying to help the broker channel grow and thrive because it's best for consumers and best for our loans and that's where we've been aligned for the last couple of years."²⁷
 - c. "Brokers have more products than any retail lender or big bank because they have access to multiple lenders. So if UWM has a unique product, brokers have access to that, just as they have access to Flagstar or Caliber's unique products. So being a broker gives you more product options, not less, because brokers have access to all lenders."²⁸
 - d. "Wholesale lenders must offer competitive pricing to compete. They don't have a captive loan like big banks and retail lenders do. Retail lenders know that if a loan

²⁵ *Id*.

²⁶ Tracey Velt, *Transcript of Interview with Mat Ishbia*, Feb. 15, 2019, available at https://www.realtrends.com/articles/mat-ishbia-ceo-united-wholesale-mortgage/ (accessed Mar. 7, 2025).

²⁷ *Id*.

²⁸ Kimberly Greene, *In order to grow, mortgage brokers need to know how to combat falsehoods*, Mortgage Professional America, Mar. 13, 2019, https://www.mpamag.com/us/mortgage-industry/business-growth/fighting-myths-one-at-atime/162167 (accessed Mar. 7, 2025).

- comes to their system, they are getting that loan whether their price is 4.5% or 4.625%, it doesn't matter. *In wholesale, if their rate is 4.625% instead of 4.5%, they don't have a chance to compete. The loan will go somewhere else.* So thinking that it's more expensive to go to a middleman is just not true."²⁹
- e. "Whether you're shopping for a house, an airline ticket or groceries, it's always better to have options. Imagine what life would be like if you were limited to only one choice for everything. It's the same thing when it comes to mortgages. Loan originators on the retail side are captive to one set of programs, one set of rates and one set of turn times. They're limited to the products, pricing and programs that they have in-house. On the other hand, brokers have access to numerous lenders, which ensures they have far more options when it comes to products, pricing, guidelines, and turn times, which in turn means better solutions for clients." 30
- f. "And so, what's going to take us to number one is really just educating consumers because when people realize the best way to get a mortgage is cheaper, faster, and easier to go to a mortgage broker. So go to findamortgagebroker.com. You find a local mortgage broker. And they shop. They send you to me at UWM, or to Quicken, or whoever the best deal for you is. But you get a lower rate." 31
- g. "[W]e're wholesale, which means we offer lower rates. And you have to get our rates through an *independent* mortgage broker. *Mortgage brokers offer lower rates* and fees to consumers. It's not my opinion. It's fact. It's backed up by data after data, after data point that if you go alone to, uh, you know, mortgage broker, findamortgagebroker.com or wherever you may go to find a local mortgage broker, you will get lower rates."³²
- h. "What excites me is the impact we can make on consumers because consumers don't know how to get a mortgage. They still think you call a bank or you ask your parents and you put 20 percent down. It's just the wrong way. You got to go to

²⁹ *Id*.

³⁰ Mat Ishbia, *Game over: Independent mortgage broker shops are obvious choice for LOs*, HousingWire, Apr. 1, 2019, https://www.housingwire.com/articles/48679-game-over-independent-mortgage-broker-shops-are-obvious-choice-for-los/ (accessed Mar. 7, 2025).

³¹ *Interview with Mat Ishbia*, Yahoo! Finance Live, Dec. 4, 2020, https://www.facebook.com/MatIshbiaUWM/videos/1330920580574049/ (accessed Mar. 7, 2025).

³² Mat Ishbia on Leadership and Mortgage Lending, Masters in Business, BLOOMBERG, at 17:00, Jul. 16, 2021, https://podcasts.apple.com/us/podcast/mat-ishbia-on-leadership-and-mortgage-lending/id730188152?i=1000529129066 (accessed Mar. 7, 2025).

- findamortgagebroker.com. You find a local person that's an expert and they will shop on your behalf."³³
- i. "Brokers are independent loan officers that are not captive to one lender, not captive to me, not captive to anyone. They're independent."34
- j. "[O]ur job is to empower mortgage brokers...They are the fastest, easiest, and cheapest way to get a mortgage. And that's not my opinion its supported by data and facts. And so what my job is, is to make sure. That they stay fastest and easiest. We already know they're cheaper. So if, if you learn nothing from me or nothing, like the cheapest way to get a mortgage is through a mortgage broker and that's findamortgagebroker.com."³⁵
- 42. Mathew Ishbia is not the only one at UWM attempting to convince consumers of brokers' independence. In fact, UWM's representations concerning brokers' independence and price-shopping across lenders are so pervasive they can be characterized as the cornerstone of UWM's marketing message.
- 43. UWM's public-facing social media accounts frequently emphasize brokers' independence and ability to shop across multiple lenders. As one emblematic example on UWM's Instagram account demonstrates, UWM represents to the public that the key attributes of an independent mortgage broker are that he or she "WORKS ON YOUR BEHALF," "PROVIDES MORE LOAN OPTIONS," and is "NOT TIED TO ONE LENDER." 36

³³ Mat Ishbia – CEO of United Wholesale Mortgage Speaks on Company Culture and Leadership, The Casey Adams Show, at 18:00, Nov. 4, 2021, https://www.youtube.com/watch?v=-Nq5cXfW2J4 (accessed Mar. 7, 2025).

³⁴ Mat Ishbia on how UWM is prepared for the 2022 market, Power House Podcast, HousingWire, at 0:20, Mar. 24, 2022, https://podcasts.apple.com/us/podcast/mat-ishbia-on-how-uwm-is-prepared-for-the-2022-market/id1426081802?i=1000555098554 (accessed Mar. 7, 2025).

³⁵ Mortgage Rate Predictions from the Nation's #1 Lender w/Mat Ishbia, BiggerPockets Real Estate Podcast, at 13:00, Sep. 6, 2022, https://podcasts.apple.com/na/podcast/biggernews-september-mortgage-rate-predictions-from/id594419649?i=1000578498263 (accessed Mar. 7, 2025).

³⁶ Figure 3, @uwmlending, Instagram (Oct. 30, 2020), https://www.instagram.com/p/CG-jVgGJTrI/ (accessed Mar. 7, 2025).

Figure 3



- 44. UWM's public-facing broker directory website, MortgageMatchup.com (discussed in more detail in Section V.C. *infra*), also emphasizes broker independence. In a UWM-authored blog post intended to educate prospective borrowers about the difference between the retail and wholesale channels, UWM represents: "A loan officer is an employee of a bank or retail lender that can only offer mortgage loan products and rates on behalf of their employer. In contrast, *a mortgage broker works on your behalf to secure the home loan that best suits your situation and needs*. Brokers can work alone or within a mortgage brokerage, but *they all leverage access to multiple lenders to present the best loan options available*."³⁷
- 45. Broker independence is likewise a point of emphasis in UWM's investor-facing communications. In UWM's 2022 Annual Report to the SEC, for example, the company included a section explaining the benefits of the wholesale channel for borrowers, which stated:

³⁷ 5 Facts about Your Local Mortgage Broker, MortgageMatchup.com, https://mortgagematchup.com/resources/blog/5-facts-about-your-local-mortgage-broker (accessed Mar. 19, 2024).

"Independent Mortgage Brokers are able to provide borrowers with multiple options on product structure and pricing rather than being rooted in a single platform offering, which we believe empowers borrowers and enhances their borrowing experience." It further stated: "In the wholesale channel, the interests of the Independent Mortgage Broker and the borrower are aligned to achieve the best outcome for the borrower...."

- 46. The purpose and effect of these messages is to convey not only that a broker's independence is essential to sourcing competitive loan pricing for borrowers, but also that each broker who originates a loan through UWM is "completely independent," has "access to all lenders," "shops" for the best price without being "captive or connected" to UWM, and that the broker originated the mortgage with UWM to "get a lower rate."
- 47. UWM does not stop there. UWM instructs brokers to use marketing tools designed by UWM's in-house marketing team to standardize and coordinate the promotional and advertising materials that brokers publish on their websites and social media pages.
- 48. To take one example, UWM has partnerships with at least two website development vendors—LenderHomePage and TAYGO—and provides brokers in its network "turnkey website templates." Brokers may simply select a template with marketing language and features that UWM itself has produced, reviewed, and approved, and then customize their website by adding their specific colors and branding. Among other things, the templates come with "[b]uilt-in SEO"

³⁸ UWM Holdings Corporation, Annual Report (Form 10-K) ("UWM 2022 Form 10-K") at 5 (Mar. 1, 2023), https://www.sec.gov/ix?doc=/Archives/edgar/data/0001783398/000178339823000008/uwmc-20221231.htm. Notably, UWM removed this language from its 2023 Annual Report.

³⁹ Figure 4, https://www.lenderhomepage.com/uwm/ (accessed Mar. 7, 2025).

(search engine optimization), "[a]utomated chat engagement," "[m]obile apps," and "[m]ortgage marketing support."40

Figure 4



- 49. UWM embeds marketing messages in these templates that advertise purported broker independence. In this way, UWM uses its brokers as a vehicle for UWM to induce borrowers to enter the wholesale channel, retain those brokers, and ultimately be funneled into a UWM loan.
- 50. Additionally, UWM instructs brokers to use a marketing portal called "Brand 360," which includes a tool called "Brand Builder." As UWM describes it:

"[Brand Builder] is like having your own team of marketing professionals without the expense. Use Brand Builder to promote your business to borrowers and real estate agents by sending out completely customized emails and fliers, or create social graphics and videos and post them directly to your social account. Start by selecting a campaign or product, choose from dozens of professionally written and designed materials, and then personalize

⁴⁰ BUILD YOUR OWN WEBSITE, https://www.uwm.com/grow-your-business/more-marketing-tools/build-your-own-website (accessed Sep. 26, 2024).

them with your company logo, font, and color. You can even swap out images for ones that are better representative of your area or region of the country."⁴¹

51. UWM's account executives strongly encourage all brokers in UWM's network to use each of its Brand 360 tools, including Brand Builder. They also frequently give training presentations to educate brokers on how to use UWM's various marketing tools. As one UWM account executive explained in one such presentation: "The reason I love Brand 360 is you set it, and you forget it. You take the five minutes to do your profile—your headshot, your website, your social media linkage, turn on your licenses, select a few compliance logos—and you're done. We do everything for you."42

Figure 5



⁴¹ Brand 360 Brand Builder, https://www.uwm.com/grow-your-business/brand-builder (accessed Aug. 13, 2024).

⁴² Figure 5, *Unlock Pro Elite Status: Your Guide to Top Mortgage Turn Times*, YouTube, Dec. 6, 2023, https://www.youtube.com/watch?v=KPGIGA2UdqA (accessed December 20, 2024).

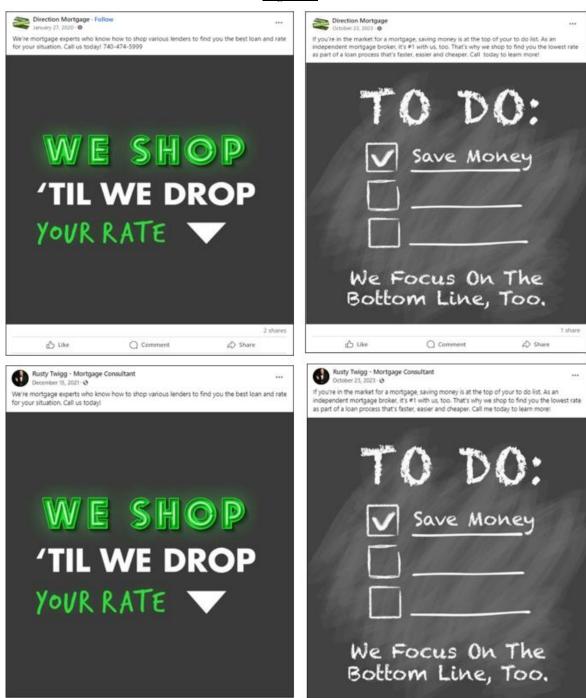
- 52. And with respect to Brand Builder, UWM emphasizes that the marketing materials the tool produces are "completely branded" to the particular broker or loan officer, concealing UWM's involvement in the creation of the marketing materials. As the same training presentation makes clear: "there is nothing UWM on it."⁴³
- 53. UWM representatives affirmatively direct brokers not to change the UWM-authored marketing content. As a UWM account executive has explained in UWM's YouTube publicity videos about the marketing materials generated by Brand Builder, "if you do change some verbiage, you get a little message that pops up, hey Corrina you're changing the verbiage, you may want to check with compliance, something along those lines, so I would just advise you, do not change anything."44
- 54. As a result, thousands of brokers and loan officers in Ohio and across the country send their prospective clients duplicated representations about the benefits of using an "independent" mortgage broker.⁴⁵ And UWM instructs brokers not to change messages prospective clients see, while failing to disclose its own involvement in the "independent" brokers' marketing. (i.e., *see* Figure 6)

⁴³ *Id*.

⁴⁴ *Id*.

⁴⁵ Figure 6, Earl Twiggs, Facebook, Dec. 15, 2021, https://www.facebook.com/photo/?fbid=449967056540960&set=a.173212177549784 (accessed Mar. 7, 2025); *Id.* at Oct. 23, 2023 (accessed Mar. 7, 2025); *Richard* S Buskirk, Company Facebook, Jan. 27, 2020, https://www.facebook.com/DirectionMtg; *Id.* on Oct. 23, 2023 (accessed Mar. 7, 2025); see *also* Appendix A.





55. The problem, as explained below, is these representations concerning broker "independence" are deliberately and knowingly false and misleading.

- 56. Not surprisingly, including because of their coordination with UWM on marketing, thousands of brokers and loan officers across the country parrot similar representations that emphasize their lack of attachment to any single lender and their consequent freedom to act on a borrower's behalf and in pursuit of the borrower's best interests.
- 57. For example, brokers' websites, social media platforms, public statements to the press, and private statements to prospective borrowers frequently reflect and convey, in substance, the advertising messages and website materials that UWM disseminates, including UWM's false and deceptive statements about broker independence, such as:
 - 1. "Our mission is to serve our customers with honesty, integrity and competence. Our goal is to provide home loans to our clients while providing them with the lowest interest rates and closing costs possible. Furthermore, we pledge to help borrowers overcome roadblocks that can arise while securing a loan."⁴⁶
 - 2. "Don't let hidden fees blow your budget! When you work with an independent mortgage broker (like me) you get a true ally in your home search. I'll walk you through your loan options, then help you choose the one that's better for your bottom line. Message me to get started!"⁴⁷
 - 3. "Looking to secure a mortgage quickly and hassle-free? Look no further! With our extensive network of lenders and streamlined application process, we ensure speedy approvals and efficient closings. Say goodbye to lengthy waiting periods and hello to your new home!"48
 - 4. "Retail lenders give you limited mortgage options that benefit them. Working with an independent mortgage broker means

⁴⁶ See https://www.umcincy.com/about-us (accessed Sep. 26, 2024).

⁴⁷ *See* https://www.linkedin.com/posts/thecurranteam_dont-let-hidden-fees-blow-your-budget-when-activity-7140293973750730752-

NRy6?utm_source=share&utm_medium=member_desktop (accessed Mar. 7, 2025).

 $^{{}^{48}}See \qquad https://www.linkedin.com/posts/thecurranteam_fastmortgagebroker-quickapprovals-dreamhome-activity-7125598003419066369-$

Vv0j?utm_source=share&utm_medium=member_desktop (accessed Mar. 7, 2025).

having an advocate on your side that will shop multiple lenders until we find the loan that suits you the most. Call today..."⁴⁹

- 5. "Want the easiest mortgage experience ever? Then work with us. We'll find you the right home loan with the right rate, the right terms and the right savings. Simple from start to finish. Give us a call or text today." 50
- 6. "Finding the perfect fit isn't easy when you buy off the rack. That's why I work with multiple lenders to find a loan that is perfectly tailored just for you."⁵¹
- 7. "The independent mortgage broker is not only the cheapest place to get your mortgage, but its [sic] also going to deliver your best experience. I had to work for years to get to [the] knowledge level that I have today. Don't be hoodwinked by some company that sponsor's [sic] a race car, or does [S]uperbowl commercials. These things only increase the cost of your loan. My overhead is low, and my service is vastly superior."⁵²
- 8. "Knowledge is power and we want you to feel the power of working with a mortgage broker. With multiple loan options, personalized service and communication every step of the way, come experience the broke difference for your next purchase or refinance."53
- 9. "Thinking owning your dream home means breaking the bank? Think again! We compare multiple lenders and with our help,

 $^{^{49}}$ See <code>https://www.linkedin.com/posts/thecurranteam_wholesalemortgages-activity-7096490838129602560-ytmr?utm_source=share&utm_medium=member_desktop</code> (accessed Mar. 7, 2025).

⁵⁰ See https://www.linkedin.com/posts/maxellemortagage_want-the-easiest-mortgage-experience-ever-activity-7183871559600685057-YiJl?utm source=share&utm medium=member desktop (accessed Mar. 7, 2025).

⁵¹ See https://www.linkedin.com/posts/maxellemortagage_finding-the-perfect-fit-isnt-easy-when-you-activity-7174435964742692864-

FLPO?utm_source=share&utm_medium=member_desktop (accessed Mar. 7, 2025).

⁵² See https://www.facebook.com/photo /?fbid=10223176397992197&set=a.1513685535997 (accessed Mar. 7, 2025).

⁵³ See https://www.linkedin.com/posts/lisa-puto-57200810_knowledge-is-power-and-wewant-you-to-feel-activity-7219019221802921984-6vvZ ?utm_source=share&utm_medium=member_desktop (accessed Mar. 7, 2025).

you could save thousands. Reach out to us today and let's get started."54

10. "Being a small brokerage we offer a boutique-style experience focusing on every detail of our customers' needs and working to design a customized mortgage loan program tailored towards each individual scenario and situation. We operate under the highest standards of honesty, integrity and fairness, providing you with a mortgage to meet your unique needs. Being brokers we are able to shop our nationwide lenders in order to find your perfect mortgage solution."55

III. UWM's Position in the Wholesale Mortgage Industry

- 58. In 2012, shortly after Mathew Ishbia became UWM's CEO, UWM was the eighth-largest wholesale lender for broker-originated loans in the country, responsible for approximately \$5.9 billion in loans and 3% of all broker-originations annually.⁵⁶
- 59. Over the next decade, UWM's annual originations and market share for broker-originated loans grew substantially.⁵⁷ In 2020, UWM became the largest wholesale lender.⁵⁸ It

⁵⁴ See https://www.linkedin.com/posts/lisa-puto-57200810_think-owning-your-dream-home-means-breaking-activity-7217913183519277056-Rl OV?utm_source=share&utm_medium=member_desktop (accessed Mar. 7, 2025).

⁵⁵ See https://www.franklinfinancialgroup.com/about-us (accessed Mar. 7, 2025)...

⁵⁶ Inside Mortg. Fin., *Top Broker and Correspondent Producers 2012* (published Aug. 22, 2018), https://www.insidemortgagefinance.com/ovt/resources/files/pdfs/imfpubs_reports/t/o/p/_/b/top_b

 $https://www.insidemortgage finance.com/ext/resources/files/pdfs/imfpubs_reports/t/o/p/_/b/top_b-roker_correspondent_producers_4q12.pdf?1558553175~(accessed Mar. 7, 2025).$

 $^{^{57}}$ See Figure 7, UWM Broker Origination & Market Share (2012-2023), based on Inside Mortg. Fin. data.

⁵⁸ Inside Mortg. Fin., *Top Third-Party Originators: 12M20* (published Feb. 18, 2021), https://www.insidemortgagefinance.com/ext/resources/Data-charts/2020/4Q20/IMF2107-03.pdf?1613667066 (accessed Mar. 7, 2025).

subsequently became the largest mortgage lender overall—retail or wholesale—accounting for more than \$107.9 billion of mortgage originations annually.⁵⁹

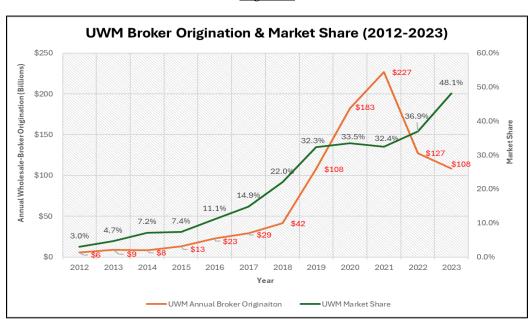


Figure 7

60. Today, UWM is the largest wholesale mortgage lender nationally with a market share of more than 48.1% of all broker-originated mortgage loans.⁶⁰ It is also the largest mortgage lender *overall*, responsible for more than 7.8% of all mortgage origination volume in the country.⁶¹ The story is much the same in Ohio, where UWM is the largest wholesale lender, with a market share of 34%, and the largest overall lender, accounting for \$1.3 billion mortgage origination in Ohio in 2023. According to UWM's statements, the company rapidly grew and maintained its

⁵⁹ Inside Mortg. Fin., *Top 50 Mortgage Lenders: 12M23* (published Jan. 25, 2024), https://www.insidemortgagefinance.com/ext/resources/Data-charts/2023/4Q23/IMF2404-01.pdf?1706200716 (accessed Mar. 7, 2025).

⁶⁰ Inside Mortg. Fin., *Top Wholesale-Broker Platforms: 12M23* (published Feb. 29, 2024), https://www.insidemortgagefinance.com/ext/resources/Data-charts/2023/4Q23/IMF2409-04.pdf?1709219683 (accessed Mar. 7, 2025).

⁶¹ Inside Mortg. Fin., *Top 50 Mortgage Lenders: 12M23* (published Jan. 25, 2024), https://www.insidemortgagefinance.com/ext/resources/Data-charts/2023/4Q23/IMF2404-01.pdf?1706200716 (accessed Mar. 7, 2025).

revenues and market share in the wholesale market by building what it calls a "Competitive Moat" through its "unique partnership model," which results in "a continually sticky customer base and significant pricing power."⁶²

- 61. UWM's business practices in pursuit of greater market share are widely regarded as brazenly aggressive.
- 62. In September 2020, Rocket Mortgage's wholesale lending division rebranded as "Rocket Pro TPO" and increased its service offerings to mortgage brokers, hoping to cut into UWM's share of the broker origination market.⁶³ Rocket's expansion in the wholesale channel threatened UWM's share of the broker origination market because Rocket was regularly able to offer lower pricing, and had other advantages in the marketplace (including, for example, that Rocket was ranked higher than UWM in industry publications like Bankrate and J.D. Power in regards to satisfaction, affordability, availability, and borrower experience).
- 63. What followed was what many industry observers called a "mortgage war" between the companies, with each side deploying increasingly aggressive public relations and commercial tactics to gain an edge over the other.⁶⁴ This "mortgage war," which included dueling Super Bowl

⁶² UWM Holdings Corporation Presentation at 18, Mar. 1, 2024, https://investors.uwm.com/news-and-events/events-and-presentations/default.aspx (Sep. 26, 2024).

⁶³ Michael Bates, *Quicken Loans Unit to Be Rebranded Rocket Pro TPO*, MortgageOrb, Sep. 22, 2020, https://mortgageorb.com/quicken-loans-unit-to-be-rebranded-rocket-pro-tpo (accessed Mar. 7, 2025); *QLMS Is Becoming Rocket Pro TPO*, YouTube, Sep. 22, 2020, https://www.youtube.com/watch?v=l5sCGnCpsL4 (accessed Mar. 7, 2025).

⁶⁴ Breana Noble, *Pontiac's United Shore roughs up Detroit's Rocket Mortgage in Super Bowl ad*, The Detroit News, Jan. 31, 2020, https://www.detroitnews.com/story/business/2020/01/31/pontiacs-united-shore-roughs-up-detroits-rocket-mortgage-super-bowl-ad/28581640 01/ (accessed Mar. 7, 2025); JC Reindl, *UWM CEO issues ultimatum, escalates war against Rocket Companies*, Detroit Free Press, Mar. 4, 2021, https://www.freep.com/story/money/business/2021/03/04/united-wholesale-mortgage-ultimatum-rocket-companies/4578357001/ (accessed Mar. 7, 2025); James Kleimann, UWM & Rocket both declare victory in broker war,

ads, culminated in UWM's implementation and enforcement of a contractual ultimatum, which effectively prohibited any broker who does business with UWM from submitting any mortgage loan applications to Rocket Mortgage, as discussed in greater detail in Section IV.A below.

- 64. Amidst this increasingly hostile competitive environment, in January 2021, UWM's corporate parent became a publicly traded company initially valued at \$16.1 billion.
- 65. The Ishbia family has maintained majority ownership and control of UWM and its affiliates at all relevant times.

IV. UWM Induces Brokers to Steer Borrowers into UWM Mortgages Over Lower Priced Options

66. As UWM explains to its investors, a core aim of its business model is to "cultivate 'loyalist' brokers who then expand the customer network." When UWM refers to "loyalist" brokers, it means brokers who direct their loyalty to UWM over the thousands of Ohio homebuyers to whom they are fiduciaries and whose best financial interests those brokers are duty-bound to represent and protect. UWM achieves this through a variety of means explained below.

A. UWM Imposes Contractual Requirements on Brokers to Prevent Them from Exercising Independent Judgment

- 67. One of UWM's primary means of influencing brokers and eliminating their "independence" is UWM's enforcement of onerous and restrictive provisions in its Wholesale Broker Agreement.
- 68. UWM mandates that any broker who wishes to do business with UWM must first agree to its Wholesale Broker Agreement. The Wholesale Broker Agreement sets forth, among

HousingWire, Mar. 18, 2021, https://www.housingwire.com/articles/uwm-rocket-both-declare-victory-in-broker-war/ (accessed Mar. 7, 2025).

⁶⁵ UWM Holdings Corporation Presentation at 6, Mar. 1, 2024, https://investors.uwm.com/news-and-events/events-and-presentations/default.aspx (accessed Sep. 26, 2024).

other things, the terms and conditions under which UWM agrees to consider purchasing and/or funding mortgage loans provided by the broker, and which govern UWM's payment of fees to the broker. UWM will not fund loans from or pay the fees of brokers who refuse to be bound by its Wholesale Broker Agreement.

- 69. At least two provisions in UWM's Wholesale Broker Agreement specifically bar brokers from shopping for loans in the best financial interest of their clients by forcing the brokers either to ignore more competitive offerings from non-UWM lenders or to conceal them from their clients. Violating either provision exposes a broker to termination of their relationship with UWM and/or exorbitant financial penalties.
- 70. First, UWM has implemented and continues to enforce the so-called "All In" policy, which contractually prohibits any broker who does business with UWM from shopping for loans from two of UWM's chief competitors, Rocket Mortgage and Fairway Independent Mortgage. The prohibition is categorical: it applies regardless of circumstance, without exception—even if the loan products offered by those competitor lenders are lower-cost and in the best interest of the broker's client.
- 71. By way of background, in September 2020, Rocket Mortgage launched its new rebranded wholesale lending services division, "Rocket Pro TPO." At the time, Rocket Mortgage was the number one overall mortgage lender in the country, with UWM ranking third, 67 while UWM was the number one wholesale mortgage lender, with Rocket Mortgage ranking second in

⁶⁶ QLMS Is Becoming Rocket Pro TPO, YouTube, Sep. 22, 2020, https://www.youtube.com/watch?v=15sCGnCpsL4 (accessed Mar. 7, 2025).

⁶⁷ Inside Mortg. Fin., *Top 100 Mortgage Lenders: 9M2020* (published Dec. 8, 2020), https://www.insidemortgagefinance.com/ext/resources/Data-charts/2020/3Q20/IMF2048_01.pdf?1607619759 (accessed Mar. 7, 2025).

that category.⁶⁸ UWM viewed Rocket Mortgage's increased investment in the wholesale channel as a threat.

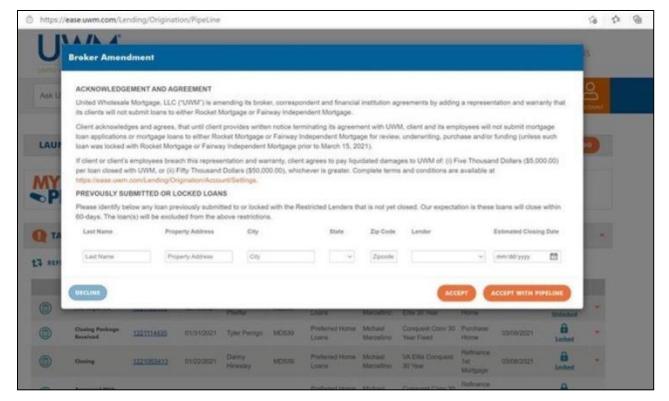
72. Several months after Rocket Mortgage's wholesale lending rebrand, on or around March 4, 2021, UWM distributed a written amendment to its Wholesale Broker Agreement to every broker in its network. The amendment provided:

United Wholesale Mortgage, LLC ("UWM") is amending its broker, correspondent and financial institution agreements by adding a representation and warranty that its clients will not submit loans to either Rocket Mortgage or Fairway Independent Mortgage. Client acknowledges and agrees, that until client provides written notice terminating its agreement with UWM, client and its employees will not submit mortgage loan applications or mortgage loans to either Rocket Mortgage or Fairway Independent Mortgage for review, underwriting, purchase and/or funding (unless such loan was locked with Rocket Mortgage or Fairway Independent Mortgage prior to March 15, 2021). If client or client's employees breach this representation and warranty, client agrees to pay liquidated damages to UWM of: (i) Five Thousand Dollars (\$5,000.00) per loan closed with UWM, or (ii) Fifty Thousand Dollars (\$50,000.00), whichever is greater.⁶⁹

⁶⁸ Inside Mortg. Fin., *Top Wholesale-Broker Channels: 9M2020* (published Nov. 25, 2020), https://www.insidemortgagefinance.com/ext/resources/Data-charts/2020/3Q20/IMF2046 _07.pdf?1606322169 (accessed Mar. 7, 2025).

⁶⁹ Figure 8, ECF No. 1-1, Ex. A at 3, *The Okavage Group, LLC v. UWM Holdings Corporation et al.*, 21-cv-00448-WWB-LLL (M.D. Fla. Apr. 23, 2022)

Figure 8



- 73. Brokers who received the amendment electronically were presented with an option at the bottom of their screens to either accept or decline the amendment. Those who declined the amendment were shown a message which stated: "By declining this amendment you are terminating your relationship with United Wholesale Mortgage. You will be able to close any loans currently in our pipeline, however. Please confirm below."
- 74. For brokers who had not yet signed UWM's Wholesale Broker Agreement before the effective date of the ultimatum (March 15, 2021), UWM altered its standard Wholesale Broker Agreement by adding a provision at Section 3.03(x) requiring all brokers to represent, warrant, and covenant, with respect to each mortgage loan the broker submits to UWM, that the broker "will not submit a mortgage loan or mortgage loan application to Rocket Mortgage or Fairway Independent Mortgage for review, underwriting, purchase, and/or funding." UWM also added a liquidated damages provision at Section 7.30 which specifies the damages for a breach of Section

3.03(x) shall be "the greater of: (i) Five Thousand Dollars (\$5,000.00) per loan closed with Rocket Mortgage, Fairway Independent Mortgage.... or (ii) Fifty Thousand Dollars (\$50,000.00), as liquidated damages for such breach without the need for proof of damages by UWM."⁷⁰

75. The implementation of UWM's "All-In" ultimatum had an immediate and dramatic impact. According to UWM, within one week of the announcement "a majority of the largest independent mortgage broker shops across the country...signed the UWM all-in addendum representing over 90% of broker shops who will no longer work with Rocket Mortgage or Fairway Independent Mortgage Corporation." During an earnings call in or around May 2021, Mathew Ishbia stated of the "All-In" ultimatum initiative: "I couldn't have imagined it going so well." According to UWM, of the 12,000 brokers in its network before the ultimatum became effective, only 600 refused to sign and 1,000 did not respond. In the first month after the ultimatum took effect (April 2021), brokers submitted 17,000 more loan applications nationally to UWM than they had in February.

76. UWM's effort to compel brokers to funnel more loans to it (and away from its competition) by threatening brokers' interests, as opposed to advancing borrowers' interests, had its intended effect. As Mathew Ishbia explained in a February 2023 interview: "The penalty of working with Rocket...is you don't get to work with UWM. And nobody is willing to take that

⁷⁰ ECF No. 1-2 at 3.03(x), 7.30, *United Wholesale Mortgage, LLC v. America's Moneyline, Inc.*, 22-cv-10228-LJM-EAS (E.D. Mich. Feb. 3, 2022).

⁷¹ Press Release, LARGEST MORTGAGE BROKER SHOPS IN AMERICA ARE ALL-IN WITH UNITED WHOLESALE MORTGAGE, UWM, Mar. 11, 2021, https://www.uwm.com/about-us/media-resources/press-releases/2021/march-11-2021 (accessed Apr. 2, 2024).

⁷² JC Reindl, *United Wholesale CEO: Our hardball tactic against Dan Gilbert firm a big success*, Detroit Free Press, May 11, 2021, https://www.freep.com/story/money/business/2021/05/11/united-wholesale-mortgage-rocket-companies/5021895001/ (accessed Mar. 7, 2025).

chance.... Once you have brokers that don't work [with] UWM, they lose out. That's why of the 12,000 brokers, 11,500 all stayed with UWM."⁷³

Not all brokers succumbed to UWM's strong-arm tactics. In an interview with National Mortgage Professional in August 2023, one such broker, who previously sent loans to both UWM and Rocket Mortgage, explained: "When the ultimatum came out in 2021 that was a deal breaker for me. If you lose that ability to choose it's an entire danger to the whole broker community." Another broker who declined the "All-In" ultimatum called UWM the "anti-broker model." He elaborated: "[T]hey always say brokers are better. Whoever says one thing and does the other thing, you shouldn't work with them." Another such broker was asked by an interviewer: "If there was never an ultimatum... if that never existed, would you have continued using Rocket and United Wholesale depending on which one better served your client at the time?" Swindell's response was: "One hundred percent. That's our job—it's to provide the best options for our clients."

78. Consistent with UWM's intent and these brokers' observations, UWM's "All-In" policy has resulted in an increasingly captive network of brokers. Any borrower who hires a broker that does business with UWM is necessarily missing out on loan products offered by other lenders, including where those loan products have a lower rate and/or lower origination costs.

⁷³ Brenda Noble, *Mat Ishbia Happy to Take Battle with Dan Gilbert into New Arena*, The Detroit News, Feb. 14, 2023, https://www.detroitnews.com/story/business/2023/02/14/mat-ishbia-happy-to-take-battle-with-dan-gilbert-into-new-arena/69900833007/ (accessed Mar. 7, 2025).

⁷⁴ Katie Jensen, *Brokerage Brawlers Discuss Ultimatum & Broker Independence*, National Mortgage Professional, Aug. 29, 2023, https://nationalmortgageprofessional.com/news/brokerage-brawlers-discuss-ultimatum-broker-independence (accessed Mar. 7, 2025).

⁷⁵ Brokers under fire for working with UWM, YouTube, Feb. 1, 2024, https://www.youtube.com/watch?v=4vyb5j0Tr6s (accessed Mar. 7, 2025).

- 79. Second, in addition to the "All-In" policy, UWM mandates that every broker who wishes to do business with UWM must accept the restrictive rate "Lock-In" policy, which is also operationalized through its Wholesale Broker Agreement.
- 80. It is common in mortgage loan transactions for borrowers to seek to "lock-in" the interest rate in a lender's offer to protect against the possibility that the interest rate may increase between the rate quote and the execution of loan documents, which could be weeks later. Lenders offer to lock-in their quoted interest rates at the beginning of the loan origination process to provide borrowers certainty that the quoted price will be honored on the closing date, even if interest rates have increased in the interim. But such "Lock-In" offers generally bind *the lender* to the interest rate; they do not preclude *the borrower or the broker* from continuing to shop the market for better terms in the lead-up to closing.
- 81. UWM, however, imposes decidedly anti-consumer "Lock-In" terms in Section 2.03(a) of the Wholesale Broker Agreement, which provides:

UWM will provide price protection for the Mortgage Loans which it agrees to purchase and/or fund hereunder in the form of a written lock-in confirmation pursuant to its lock-in policies and in accordance with UWM's lending requirements. The time at which the interest rate for a Mortgage Loan is locked in shall be at Broker's option, provided, however, a Mortgage Loan with a locked in interest rate must be presented to UWM for purchase and/or funding before the expiration of the lock-in period. For purposes of the Agreement, the "lock-in period" shall be determined in accordance with UWM's lending requirements. If a Mortgage Loan is not presented for funding by UWM within the lock-in period, such Loan may be re-priced at the sole option of UWM. The transfer or sale by Broker of a Mortgage Loan locked in by UWM during the lock-in period to another entity, shall constitute a violation of the Agreement, and the Broker shall be liable, and promptly indemnify UWM, for any loss sustained as a result thereof by UWM. In addition, Broker shall notify UWM immediately should any commitment by UWM for a locked-in Mortgage Loan be canceled,

withdrawn, or otherwise determined not to be set for purchase and/or funding by UWM.⁷⁶

- 82. Under Section 2.03(a), accordingly, once a mortgage broker obtains a "locked-in" rate quote from UWM on the borrower's behalf, UWM precludes the broker from shopping for a loan from another lender that would be more advantageous for the borrower—even if such offers from other lenders exist and the broker is aware of them. If, after the rate is locked-in with UWM, the broker tries to fulfill his or her responsibilities to the borrower by alerting him or her to a better rate or finding and placing a mortgage loan with another lender on better terms, "the Broker shall then be liable, and promptly indemnify UWM, for any loss sustained as a result thereof by UWM."
- 83. No other wholesale lender imposes such strict no-shop restrictions in connection with rate-locks. This provision is unique to UWM. The effect is that a rate-lock with UWM not only "locks-in" the interest rate, but it "locks-in" the borrower to a UWM mortgage, even if there are better options elsewhere that the broker is precluded from presenting.
- 84. Critically, neither UWM nor the brokers disclose the terms of UWM's Wholesale Broker Agreement to borrowers prior to the borrower's engagement of the broker or the closing of the loan. So, at all relevant times, borrowers are entirely unaware of the significant contractual restrictions like the "All-In" and "Lock In" provisions that UWM imposes on their brokers. The concealment and non-disclosure of these restrictions from Ohio consumers is a component of UWM's scheme.

⁷⁶ Wholesale Broker Agreement § 2.03(a) (emphasis added).

- B. UWM Carefully Monitors Broker Loyalty and Punishes Brokers Who Shop for Lower Rates with UWM's Competitors
- 85. UWM's "All-In" and "Lock-In" policies are not just public-relations stunts or empty threats. UWM expends significant resources to police brokers' transactions to ensure that none of the brokers in its network submit a single loan or loan application that violates any provision in its Wholesale Broker Agreement, including its "All-In" and "Lock-In" policies.
- 86. To this end, UWM compiles and closely monitors information available from public and private databases, which enables it to track every mortgage loan in which each of the brokers in its network is involved. Among other things, UWM maintains a detailed internal database, which contains information on every broker and loan officer in its network. At all times, for example, UWM knows and tracks:
 - a. How many loans each broker and loan officer has sent to UWM over various time ranges (e.g., in the last month, the last year, over the lifetime of the broker's or loan officer's relationship with UWM);
 - b. What percentage of total loans and total loan volume each broker and loan officer has sent to UWM (e.g., in the last month, the last year, over the lifetime of the broker's or loan officer's relationship with UWM);
 - c. How often each broker and loan officer are using various UWM services and technological platforms; and
 - d. Whether a broker or loan officer has originated a loan that is not in compliance with either UWM's "All-In" or "Lock-In" policies.
- 87. UWM's account executives and other employees are tasked with monitoring UWM's databases to ensure that brokers' and loan officers' engagement with and fidelity to UWM remains high. Brokers and loan officers have reported receiving harassing communications from

UWM employees demanding to know why the percentage of loans they sent to UWM versus other wholesale lenders dropped in the preceding month. Brokers and loan officers have likewise reported receiving similar communications from UWM after placing loans with rival lenders. In directing employees to make these harassing communications, UWM intended to influence, and did influence, mortgage brokers to act in the interests of UWM rather than the borrowers.

- 88. Because of UWM's hawk-like monitoring of brokers' and loan officers' transactions, whenever a broker or loan officer closes a loan that is not in compliance with the company's "All-In" or "Lock-In" policies, UWM is aware.
- 89. UWM also routinely takes legal action against brokers to enforce the restrictions in its Wholesale Broker Agreement. In the three years since UWM first implemented its "All-In" ultimatum, the company has brought at least five lawsuits against various broker firms seeking damages for alleged breaches of the ultimatum provisions in its Wholesale Broker Agreement, including in December 2023, when UWM sued Ohio broker Madison Atrina LLC d/b/a District Lending in the Eastern District of Michigan seeking at least \$685,000 in damages. The action remains pending.⁷⁷

C. UWM Offers Things of Value to Brokers Who Demonstrate Their Commitment to Funneling Loans to UWM

90. UWM also corrupts brokers by offering them value in exchange for the brokers' loyalty to UWM, including through funneling clients to UWM. In view of its market position, UWM is uniquely suited to direct borrowers to brokers and thus to control brokers' deal-flow—the lifeblood of a broker's revenue stream.

⁷⁷ United Wholesale Mortg., LLC v. Madison Atrina LLC, Case No. 2:23-CV-13176-LJM-KGA (E.D. Mich).

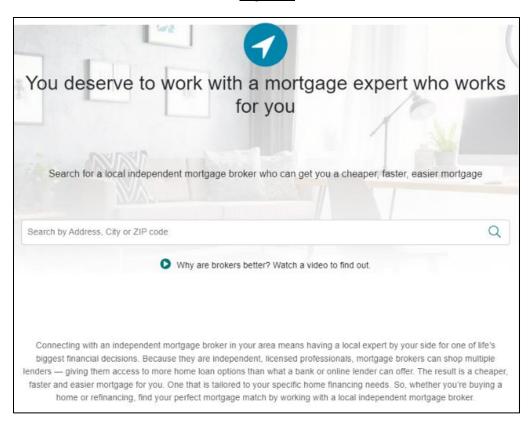
- 91. Often, UWM will expressly offer value to brokers in exchange for brokers increasing the rate at which they funnel loans to UWM. As discussed above, UWM tracks wholesale brokers' funneling rates. When UWM finds that a broker's funneling rate is unacceptably low, UWM has been known to offer the broker value—such as an offer to waive penalties to the broker for a borrower's early pay-off—expressly contingent on the broker increasing the rate at which he or she funnels loans to UWM.
- 92. In addition, in May 2018, UWM launched a borrower-facing website called FindAMortgageBroker.com (which was later renamed "MortgageMatchup.com"). According to UWM, the website was designed to serve both as a national search engine that prospective borrowers could use to locate a mortgage broker in their area and as an educational guide with written and video content explaining the value of using a mortgage broker. As UWM's CEO Mathew Ishbia release announcing the stated the press new website: "FindAMortgageBroker.com gives consumers nationwide a platform to easily locate nearby mortgage brokers and learn about why they're the best choice for getting a mortgage."⁷⁸
- 93. Since its launch, the website has featured content describing the supposed value proposition for using an independent mortgage broker—namely that a broker's allegiance lies with the borrower, not an individual lender, and thus a broker can shop offers from multiple lenders to find the best deal for the borrower. For example, beginning no later than May 2021, the front page of the website stated:

Connecting with an independent mortgage broker means having a local expert by your side for one of life's biggest financial decisions. Because they are independent, licensed professionals, mortgage brokers can shop multiple lenders — giving them access to more

⁷⁸ Caroline Basile, *United Wholesale Mortgage launches consumer-facing broker website*, HousingWire, May 8, 2018, https://www.housingwire.com/articles/43304-uwm-launchesconsumer-facing-broker-website/ (accessed Mar. 7, 2025).

home loan options than what a bank or online lender can offer. The result is a cheaper, faster and easier mortgage for you....⁷⁹

Figure 9



94. The explanatory video at the top of the homepage conveys a similar message. The narrator explains:

Most banks and big online lenders only offer their own mortgage products, with limited options, limited communication, and lengthy waiting periods that can drag out your closing. When you work with an independent mortgage broker, you have a local mortgage expert on your side to personally advise you throughout the process, and who has your best interest in mind. *They'll shop dozens of lenders to find the right home loan for your needs....*⁸⁰

⁷⁹ Figure 9, https://findamortgagebroker.com, Retrieved from *Internet Archive*, (archived on May 18, 2021), https://web.archive.org/web/20210518114811/https://findamortgagebroker.com/ (accessed Mar. 7, 2025).

⁸⁰ Figure 10, https://findamortgagebroker.com, Retrieved from *Internet Archive* (archived on May 18, 2021), https://web.archive.org/web/20210518114811/https://findamortgagebroker.com/ (accessed Mar. 7, 2025).

- 95. Other "Guides" and articles on the website likewise describe a mortgage broker as "a home loan expert that connects prospective homeowners with willing mortgage lenders" and who "shop[s] around to find the best interest rates, terms, and loan products" that meet the borrower's needs.⁸¹
- 96. In January 2024, UWM rebranded FindAMortgageBroker.com, changing its name to MortgageMatchup.com.⁸² The rebranded website contains much of the same content, including the broker search directory, UWM's representations that mortgage brokers "shop around to find the best interest rates, terms, and loan products that meet your needs," and that the search engine will help the prospective borrower connect with a local mortgage broker who is an "independent, licensed professional in your area who can shop on your behalf and give you access to more home loan options...than a bank or an online lender." ⁸⁴
- 97. UWM has spent, and continues to spend, considerable effort and millions of dollars in advertisements to promote its website and drive more web traffic to the content it features. Among other things, UWM promoted FindAMortgageBroker.com in two television commercials

⁸¹ 5 Facts About Your Local Mortgage Broker, Jan. 22, 2021, https://findamortgagebroker.com/resources/guides/all-guides/guides/2021/01/23/5-facts-aboutworking-with-a-local-mortgage-broker, Retrieved from *Internet Archive* (archived on May 18, 2021), https://web.archive.org/web/20210518100649/https://findamortgagebroker.com/resources /guides/all-guides/guides/2021/01/23/5-facts-about-working-with-a-local-mortgage-broker (accessed Mar. 7, 2025).

⁸² Press Release, *UWM Rebrands FindAMortgageBroker.com to Mortgage Matchup*, UWM.com, Jan. 17, 2024, https://www.uwm.com/about-us/media-resources/press-releases/2024/january-17-2024 (accessed Apr. 2, 2024).

⁸³ See Facts About Your Local Mortgage Broker, https://mortgagematchup.com/resources/blog/facts-about-your-local-mortgage-broker (accessed Apr. 2, 2024).

⁸⁴ https://mortgagematchup.com/ (accessed Mar. 7, 2025).

that aired during Super Bowl LIV in 2020 and Super Bowl LV in 2021, respectively, making it the most prominent search engine for mortgage brokers nationwide.⁸⁵

Figure 10



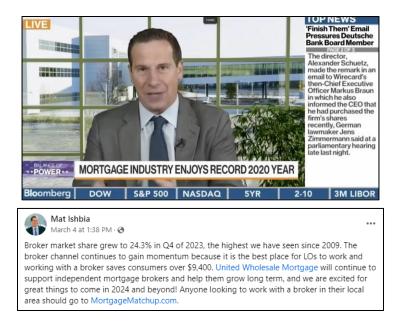


98. UWM's CEO Mathew Ishbia also frequently promotes the website during interviews and on social media. For example, in a January 2021 interview with Bloomberg, Mathew Ishbia explained: "You know, it's all about you know finding great mortgage brokers. So we work with great mortgage brokers. FindAMortgageBroker.com. There's a lot of great mortgage brokers. It's the cheapest, fastest, easiest way to get a mortgage. And so what we're really big on is helping advocate for them, and help educate consumers that the best way to get a mortgage is to go through them. Then you get great partners...."

⁸⁵ Figure 10, Kimberly Greene, UWM challenges Rocket Mortgage in first-ever Super Bowl ad, MPAmag.com, Jan 31, 2020, https://www.mpamag.com/us/news/general/uwm-challenges-rocket-mortgage-in-first-ever-super-bowl-ad/212162 (accessed Mar. 7, 2025); *FindAMortgageBroker.com Superbowl LV Commercial*, Mat Ishbia's Facebook Page, Feb. 2, 2021, https://www. facebook.com/MatIshbiaUWM/videos/421213375778520/ (accessed Mar. 7, 2025).

⁸⁶ See, e.g., Figure 11, *Mat Ishbia Bloomberg 1.15.21*, Mat Ishbia's Facebook Page, Jan. 15, 2021, https://www.facebook.com/MatIshbiaUWM/videos/432886534423072/ (accessed Mar. 7, 2025); Mat Ishbia's Facebook Page, Mar. 4, 2021 at 1:38 PM, https://www.facebook.com/MatIshbiaUWM (accessed Mar. 7, 2025).

Figure 11



- 99. In reality, FindAMortgageBroker.com (now MortgageMatchup.com) is a tool for UWM to compel brokers to steer loans to UWM.
- 100. From the brokers' perspective, it is critical to be featured in the search results of the FindAMortgageBroker.com. It is also highly valuable to them—much like the value to businesses in securing priority search results on Google, which businesses pay substantial amounts to accomplish. This means that UWM has enormous market power through its directory website.
- 101. And UWM leverages that power. In short, UWM uses the website to steer borrowers who use FindAMortgageBroker.com *to the brokers that steer the most loans to UWM* by featuring them in search results. The message to brokers is simple: the more you steer borrowers to UWM, the more UWM will steer borrowers to you and thus increase your deal flow and revenue.
- 102. The specifics are as follows: To be listed on UWM's broker directory, a broker must be a "UWM Partner" who has signed UWM's Wholesale Broker Agreement. The results from the broker search engine therefore exclude brokers who (a) do not do business with UWM; and/or (b) who do not agree to boycott UWM's chief competitor, Rocket Mortgage.

- 103. None of this is disclosed on the website. To the contrary, the statements on the website, in combination with pervasive public representations by company representatives and UWM itself (including through the brokers, *see supra* Section II), are intended to mislead consumers into believing the brokers do *not* have undisclosed allegiances or connections to UWM.
- 2IP code into a search bar at the top of the screen.⁸⁷ The algorithm that determines the search results, however, ranks brokers according to their "PRO Score," a numerical value that UWM assigns every broker in its network as part of its "PRO Rankings" system. As UWM explains on its broker-facing website, "[t]he higher your PRO Score...the more visibility you'll have on Mortgage Matchup."⁸⁸

Meet Your Home Loan Expert

Find the right matchup for you

Search by Address, City or ZIP Code

Resources

Calculators

For Real Estate Agents

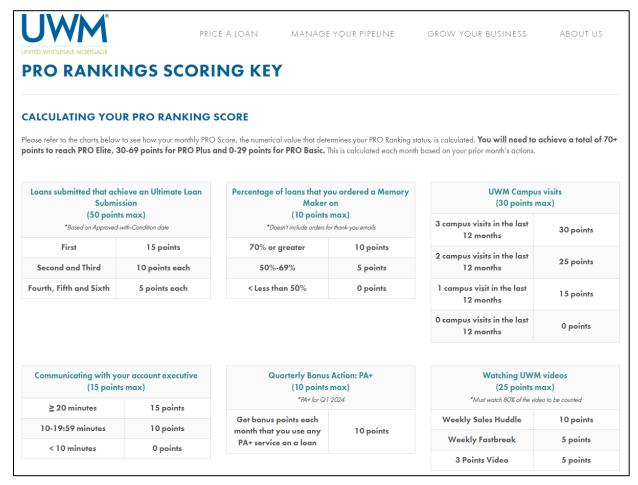
Figure 12

⁸⁷ Figure 12, https://mortgagematchup.com/ (accessed Mar. 16, 2024).

⁸⁸ PRO Rankings, https://www.uwm.com/pro-rankings (accessed Mar. 16, 2024).

105. A broker's "PRO Score" is calculated each month based on actions the broker has taken in the prior month. Brokers earn "points" toward their PRO Score by, among other things, (i) submitting loan applications with UWM, (ii) visiting UWM's campus, (iii) communicating with UWM account executives, and (iv) engaging with UWM's content online.⁸⁹

Figure 13



106. Each of these components of a broker's PRO Score is a proxy for loyalty to UWM. The brokers who are most loyal to UWM, and who place the highest proportions of their loans

⁸⁹ Figure 13, *PRO Rankings Scoring Key*, https://www.uwm.com/pro-rankings-scoring-key (accessed Mar. 16, 2024).

with UWM, receive the highest PRO Scores and the accompanying promotional services and access to other benefits.

107. For example, brokers can earn up to 50 points each month by achieving up to six "Ultimate Loan Submissions." To achieve an "Ultimate Loan Submission," a broker must submit a loan application while using at least five of UWM's exclusive tools for compiling, organizing, and verifying borrower information—tools that can only be used in connection with UWM loan submission. Similarly, brokers can earn points by ordering a "Memory Maker" on high proportions of their loans (5 points for 50-69% of their loans; 10 points for 70% or more of their loans). But "Memory Makers"—personalized thank-you gifts for real estate agents or borrowers, like cutting boards or welcome mats—can only be ordered for loans placed with UWM. So essentially, brokers can earn these points only if they place an increasing proportion of their overall loans with UWM.

MortgageMatchup.com) are deliberately biased toward brokers who are corrupted in favor of UWM. The website is designed to steer borrowers to brokers who funnel nearly all their business to UWM, regardless of whether UWM offers the most competitive loan terms. Conversely, brokers who do not funnel loans to UWM can expect UWM (through MortgageMatchup.com) to *decrease* the number of borrowers that seek their services. And finally, the search results are designed to categorically exclude brokers who *ever* refer borrowers to Rocket Mortgage, even when Rocket Mortgage offers better prices.

⁹⁰ *Ultimate Loan Submission*, https://www.uwm.com/ultimate-loan-submission (accessed Mar. 16, 2024).

109. To illustrate the point, if a borrower searches for Columbus, Ohio, in the search bar, the top five brokers that appear in the results are Steve Greaves (NMLS# 1287759), Joseph Sauk (NMLS# 589820), William Seach (NMLS# 896893), Rory Driscoll (NMLS# 827775), and John Lanz (NMLS# 1455525). Fach of those brokers funneled most or nearly all of his loans to UWM (and they also effectively pledged to withhold information from borrowers about any lower interest rates offered by Rocket). Greaves sends 81% of his loans to UWM. Sauk sends 90%. Seach sends 87%. Driscoll sends 89%. Lanz sends 100%. Accordingly, they cannot be independently shopping across multiple lenders for the best priced loans available to their clients. Instead, these supposed fiduciaries are sending the vast majority of their clients to one lender: UWM.

👉 mortgage matchup Resources V Calculators ~ Showing Mortgage Originators Near Columbus, OH, USA 143 results Filter 🔽 Steve Greaves Joseph Sauk > WILLIAM SEACH Rory Driscoll > > John Lanz Cory Freilich >

Figure 14

110. Together, the website and PRO Score system create a powerful inducement for brokers to funnel business to UWM regardless of the best interests of consumers. With up to tens

 $^{^{91}}$ Figure 14, https://mortgagematchup.com/search?query=columbus%2C+ohio&page=1 (accessed Mar. 16, 2024).

of thousands unique visitors per month, UWM's website is among the most valuable and important sources of business generation for mortgage brokers in the United States.

- 111. Placement on FindAMortgageBroker.com and MortgageMatchup.com is not the only inducement that UWM provides to brokers to influence and interfere with their decision-making. UWM also uses its PRO Rankings and LO Partner Points programs to provide financial and other benefits to brokers who steer their customers to UWM.
- 112. With respect to the Pro Rankings System, brokers increase their "PRO Score" and "PRO Ranking status" by funneling more borrowers to UWM. 92 The "PRO Score" that UWM assigns to each broker in its network provides them access to one of three "status" tiers—PRO Basic (for scores of 0-49), PRO Plus (for scores of 50-69), or PRO Elite (for scores of 70+). 93

Figure 15

Points are combined for a total PRO Score that'll put you in one of three tiers for that month:



113. UWM provides increasingly attractive financial and other benefits to brokers depending on the "status" tier they achieve by funneling loans to UWM. As Mathew Ishbia explained on UWM's Instagram feed: "Being PRO Elite matters. You get more FindAMortgageBroker.com leads. You get more opportunity. Faster turn times. All the things

⁹² PRO Rankings, https://www.uwm.com/pro-rankings (accessed Mar. 16, 2024).

⁹³ Figure 15, UWM's LinkedIn Page, https://www.linkedin.com/posts/united-wholesale-mortgage_weve-made-some-powerful-changes-that-make-activity-7022203122810839040-lt9P/ (accessed Mar. 7, 2025).

matter with PRO Elite."⁹⁴ Whether characterized as getting "more leads" or "more opportunities," in substance what brokers receive is UWM's valuable assistance in making more money for themselves, regardless of the consequences to borrowers.

114. One particularly crucial benefit for brokers who achieve PRO Plus or PRO Elite status is faster turn times. This is a highly valuable benefit for mortgage brokers. The more time that passes between the beginning of the approval process and closing, the greater the chance that something might derail the transaction—an interest rate fluctuation, cold feet from the buyer, etc. Because brokers only get compensated if the mortgage loan closes, speed is therefore paramount to brokers. Time spent on a transaction that was too slow to close is also time wasted for the broker. The faster transactions can close, the more deal-flow brokers can generate and process, and the more money they can make for themselves.

115. Generally, when a new loan file is submitted to UWM for underwriting, it will take more than two days for UWM's underwriters to review and verify the information in the file and send it back to the broker. For brokers who achieve PRO Plus status, however, UWM's underwriters will guarantee completion of initial underwriting within two days. For brokers who achieve PRO Elite status, the initial underwriting turn time is guaranteed within one day. And if the file is returned with conditions—that is, if the underwriter is requesting additional documentation or clarification concerning certain information in the file—UWM will ensure the additional information is reviewed and confirmed also within one day, but again, only if the submitting broker has PRO Plus or PRO Elite status.⁹⁵

 $^{^{94}}$ @uwmlending, Instagram, Oct. 2, 2023, https://www.instagram.com/p/Cx5sgI1uFee/?img_index=1 (accessed Mar. 7, 2025).

⁹⁵ Figure 16, *PRO Rankings*, https://www.uwm.com/pro-rankings (accessed Mar. 16, 2024).

Figure 16

	PRO Elite PRO Score of 70+		PRO Plus PRO Score of 30-69		PRO Basic	
	Initial UW	Conditions	Initial UW	Conditions	Initial UW	Conditions
Conventional	1	1	2	1	2+	1+
FHA	1	1	2	1	2+	1+
Non-Agency*	2	1	3	2	3+	2+
USDA	1	1	2	1	2+	1+
VA	1	1	2	1	2+	1+
Last updated on March 17, 20	24					Turn Times Det

- 116. Again, the message that UWM sends to brokers through this scheme is clear: the more loans you funnel to UWM, the faster UWM will process loans for you, and the more money you will make.
- 117. Additionally, by achieving elevated PRO status or accruing LO Partner Points—
 "points" that can be redeemed for various gifts and other benefits—brokers can gain access to
 exclusive UWM teaser products such as interest rate discounts, "1% down" products, and rate
 relocks. But, again, these are offered only to those brokers who first prove their loyalty by
 funneling borrowers to UWM, regardless of whether UWM offers the best deal to borrowers. And
 even those offerings generally do not convert into actual savings for clients. As discussed below,
 even after accounting for such offerings, UWM borrowers who worked with UWM's corrupted
 brokers routinely pay hundreds or even thousands more than they would have with even just a
 median loan product (much less the most competitive product at the time).
- 118. Through its FindAMortgageBroker.com website and its PRO Rankings and LO Partner Points programs, UWM sends a clear and unmistakable message to the population of "independent brokers" in the market: If you funnel loans to UWM rather than shop on behalf of your customers, UWM will enrich you. The predictable result is that brokers—chasing their self-interest—accede to UWM's inducement, resulting in the dynamic described below in Sections V

and VI, where UWM and thousands of brokers collude to drive an unconscionable proportion of borrowers to UWM who would be better off getting their loans elsewhere.

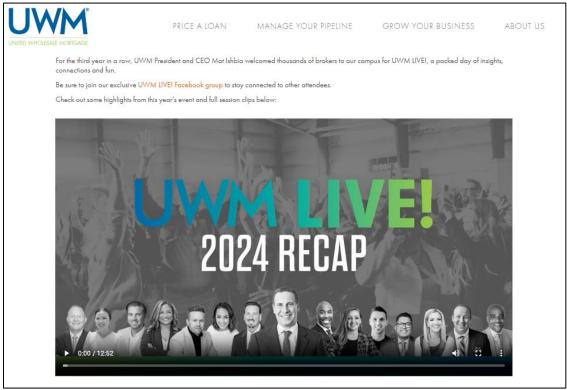
- 119. As discussed above in Section II, UWM also creates advertising materials that it provides to its corrupted brokers for no cost. These benefits, which are not disclosed to borrowers, enable corrupted brokers to take UWM-created social media and video content, insert the broker's own branding, and present it as their own. 96 The Brand Builder platform allows brokers to choose from a wide selection of pre-made images and infographics, change the color scheme, and schedule posts in advance. At every step of the way, brokers have access to a UWM account executive to help troubleshoot, provide training, and give additional support. Producing these marketing materials (or hiring a firm to design them) would otherwise cost brokers upwards of tens of thousands of dollars.
- 120. Additionally, as discussed above, in 2023 UWM launched "Memory Maker," a proprietary software platform it provides for no monthly cost to its corrupted brokers. Memory Maker facilitates customer and referral follow-up letters and thank-you notes. It also provides a selection of gifts the brokers can send along with their written correspondence, like cutting boards or welcome mats. "Once brokers choose which thank you item they'd like to send, they simply select when they'd like it sent and UWM will handle the rest."
- 121. UWM also frequently flies corrupted brokers to its campus in Pontiac, Michigan for days-long conventions, training courses, and events, which often feature lavish meals and live entertainment, all at UWM's expense.

⁹⁶ Brand 360 Brand Builder, https://www.uwm.com/grow-your-business/brand-builder (accessed Mar. 16, 2024).

⁹⁷ *UWM Announces Two New Initiatives at AIME FUSE*, https://www.uwm.com/about-us/media-resources/press-releases/2023/october-7-2023 (accessed Sep. 26, 2024).

122. Among other things, UWM hosts an annual convention called "UWM LIVE!" during which it welcomes "thousands of brokers" to its campus for "a packed day of insights, connections and fun."98 The event includes speeches on broker practices from wholesale industry stakeholders including UWM personnel and brokers, as well as networking sessions to provide broker attendees opportunities to discuss their brokerage activities with one another and UWM.

Figure 17



- 123. Numerous brokers who have attended UWM LIVE! and UWM's many other inperson networking events and trainings describe them as raucous parties, heavy on free perks for attendees.
- 124. UWM and Mathew Ishbia ensure that the top brokers and loan officers who demonstrate the highest degrees of loyalty—steering exceptionally high volume and high

⁹⁸ Figure 17, *UWM Live!*, https://www.uwm.com/uwm-live (accessed Sep. 26, 2024).

percentages of loans to UWM—are rewarded handsomely. Every year, for example, UWM distributes an "Excellence Award" to brokers with high UWM loan funneling percentages. It also distributes "Top Broker" awards to the top brokers and loan officers in every state, "Top 1%" awards to the brokers who rank in the top 1% of all brokers ranked by UWM loan volume, and "Elite 100" awards to the brokers who UWM has ranked in the top 100 of all UWM broker partners across the country.

125. In addition to the recognition, these awards often come with extravagant benefits, including vacations, meals, and entertainment. In 2019, for example, UWM and AIME funded an "awards trip" to a 5-star luxury hotel, the Andaz Costa Rica Resort at Peninsula Papagayo, for a select group of high-funneling brokers and loan officers.⁹⁹



Figure 18

⁹⁹ Figure 18, LinkedIn, https://www.linkedin.com/posts/melaniewalburg_grateful-pumpedfor2020-brokersarebetter-activity-6629008645722030080-Bubr?utm_source=share&utm_medium=member_desktop (accessed Mar. 7, 2024).

V. UWM's Tactics Have Caused Thousands of Mortgage Brokers to Funnel Loans to UWM, Costing UWM Borrowers Billions in Above-Market Costs

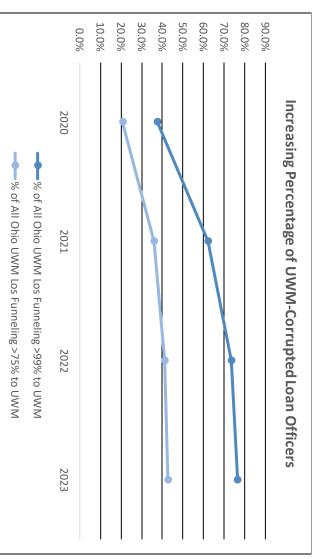
126. UWM's tactics were intended to cause, and did cause, a steadily increasing proportion of mortgage brokers to refer the vast majority of their borrower-clients to UWM without shopping for loans that are in those borrower-clients' best financial interests. This trend is evident throughout the wholesale mortgage industry—up and down the market, in every geographic region, including Ohio.

127. According to publicly available data (including HMDA and Deeds of Trust records), starting in 2021, the year UWM's "All-In" ultimatum went into effect, the proportion of Ohio loan officers who steer 75% or more of their loans to UWM has expanded dramatically.

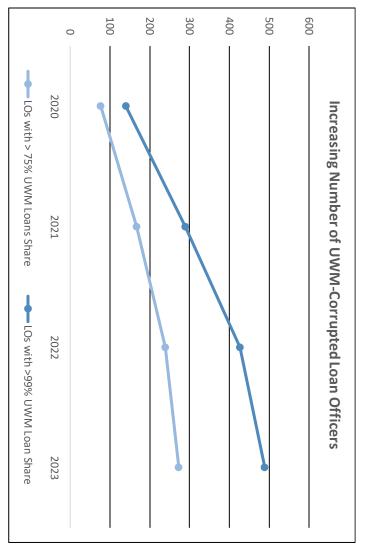
128. By 2023, of the 639 Ohio loan officers who sent at least one loan to UWM, 273 loan officers sent more than 75% of their loans to UWM, which constituted more than 43% of the loan officers who sent at least one loan to UWM, up from approximately 20% in 2020. And of those loan officers, 216 sent more than 99% of their loans to UWM. Between 2020 and 2023, the proportion of loan officers who steer virtually all (99% or more) of their loans to UWM more than doubled, increasing from 16.9% of the total UWM loan officer population to over 33.8% of the loan officer population.¹⁰⁰

¹⁰⁰ Figures 19 & 20, Analysis of publicly available data.

Figure 19

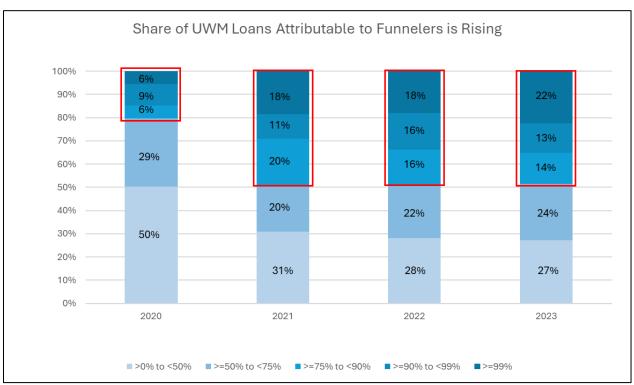






129. As the population of loan officers who steer loans to UWM has expanded, the loans that are generated by those loan officers have become increasingly critical to UWM's overall business. Figure 25, below, which again is based on HMDA data required to be maintained by CFPB and Deed of Trust records, illustrates this trend. In 2020, Ohio loan officers who sent 99% or more of their loans to UWM accounted for approximately 6% of UWM's Ohio brokered loans (218 loans total). By 2023, that number had more than tripled to 22% (908 loans total). Similarly, in 2020, Ohio loan officers who sent more than 75% of their loans to UWM accounted for approximately 20% of UWM's total Ohio brokered loan volume (\$150,681,313). By 2023, that number had more than doubled to 48.5% (\$467,076,710). 101

Figure 21



¹⁰¹ Figure 21, Analysis of publicly available data.

- 130. In particular, the loan volume attributable to the loan officers who are the most prolific loan-funnelers—those who send 99% or more of their loans to UWM—has accounted for an increasing amount of UWM's business. From 2021 to 2023, these fully captive Ohio loan officers, who send 99% or more of their business to UWM, accounted for over \$605 million of UWM's loan volume. In the same time period, the Ohio loan officers who send at least 75% of their business to UWM accounted for over \$1.5 billion of UWM's loan volume.
- 131. Even when considering only loan officers who originate a minimum of five loans with UWM in a year, the proportion of Ohio loan officers who send more than 75% of their loans to UWM is also steadily increasing. In 2020, 13% of all Ohio loan officers who originated five or more loans in a year (19 loan officers total) sent 75% or more of their loans to UWM. By 2023, that number more than tripled to 49% of all such Ohio loan officers (102 loan officers total).
- 132. These Ohio loan officers—who originate at least five loans in a year and who funnel at least 75% of their loans to UWM—likewise account for a growing proportion of the total loans and loan volume that UWM originates. In 2020, this group accounted for 606 loans, the collective value of which was \$134,245,271 (or 20% of UWM's total brokered loan volume). In 2023, this group accounted for 1,709 loans, the collective value of which was \$404,048,400 (or 51% of UWM's total brokered loan volume). From 2021 to 2023, the total loan volume generated by these Ohio loan officers was over \$1.495 billion.
- 133. The same phenomenon presents when considering data at the *broker level* as opposed to the *loan officer* level. For instance, in 2020, 15 Ohio brokers (or 23% of all Ohio brokers that brokered at least five loans with UWM that year) funneled 75% or more of their total loans to UWM. By 2023, that number ballooned to 57 (or 47% of all brokers that brokered at least five loans that year).

- 134. The data is clear, moreover, that this loan funneling behavior among loan officers and brokerages is neither a naturally occurring phenomenon nor a function of UWM offering more affordable loans than the competition. One way to evaluate this is to compare UWM's loan-origination fees to those of other lenders for mortgage loans at comparable interest rates. Origination fees are upfront fees paid by the borrower to the lender as compensation for executing and processing the loan. Origination fees do not correlate with anything of value to the borrower; they are simply higher costs that inure to the benefit of the lender (and the broker, to the extent the broker's fee is paid out of the overall origination fee). Thus, among the loan products with the same interest rates, the borrower's only financial motivation is to obtain the product with the lowest origination fee.
- 135. Publicly available data published pursuant to the Home Mortgage Disclosure Act ("HMDA") demonstrates that UWM consistently charges higher origination fees than the *median* wholesale lender—let alone the most competitively priced lenders. According to one analysis of HMDA data, in 2020, Ohio borrowers paid on average \$498 more in closing costs for a UWM loan as compared to a borrower who paid the median amount of closing costs for a similar loan from another wholesale lender, controlling for interest rates.
- 136. When comparing Ohio UWM borrowers' origination costs to more competitively priced Ohio lenders (those whose origination costs are at the twentieth percentile), UWM borrowers paid, on average, approximately \$1,016 more in 2023.
- 137. In addition to having higher costs (while controlling for interest rates), UWM also does not offer lower interest rates when controlling for costs. In 2023, its rates were consistently at or above the median. Indeed, Mathew Ishbia has boasted to investors that he can "set the margins daily" and dictate the costs and rates borrowers pay. "It's not market-driven," Mathew Ishbia said

on an earnings call last year. "Every day, I look at the pricing, I set it with our capital markets team. Personally, I do it."

UWM loans are compared to substantially similar loans available at the same time from other wholesale lenders, the data shows that UWM's loans are systematically more expensive, regardless of whether UWM claims that its average rate spread is purportedly lower than that of other wholesale lenders. This is true for numerous reasons, including that (i) different lenders calculate the inputs to a rate spread calculation differently, meaning that comparing rate spreads across lenders is not reliably an apples-to-apples comparison; and (ii) a crude comparison of lenders' average rate spread fails to control for the different mix of loan products that different lenders offer.

139. The consideration of FICO scores also supports the conclusion that UWM's loans are systematically more expensive. For example, according to UWM's 2023 10-K: "For the year ended December 31, 2023, our originated loans had a weighted average loan to value ratio of 82.89%, and a weighted average FICO score of 737. For the year ended December 31, 2022, our originated loans had a weighted average loan to value ratio of 79.67%, and a weighted average FICO score of 738." For comparison, according to Rocket Mortgage's 2023 10-K, its originated loans had a weighted average FICO score of 733 in both 2023 and 2022. Based on the difference in the weighted average FICO score, Rocket Mortgage would be expected to have more expensive

¹⁰² UWM 2023 Form 10-K at 59.

¹⁰³ Rocket Companies, Inc., Annual Report (Form 10-K) at 61 (Feb. 27, 2024), https://www.sec.gov/ix?doc=/Archives/edgar/data/1805284/000180528424000009/rkt-20231231 .htm.

loans, on average, than UWM—but the opposite is true: UWM had more expensive loans in Ohio, on average, than Rocket.

- 140. Consistent with this, UWM is the largest wholesale lender by a wide margin—it originates over a third of wholesale loans in Ohio. As a consequence of its position, UWM lends to borrowers across the distribution of FICO scores, and there is nothing to indicate that UWM originates a disproportionate percentage of its loans to borrowers with poor credit.
- 141. On its face, the behavior of a broker or loan officer who steers such high proportions of loans to a single lender—UWM—is incompatible with the notion that the broker or loan officer is "independent" or working on the borrower's behalf, much less that the broker or loan officer is meeting the fiduciary and agency duties owed to clients. In fact, it is essentially statistically impossible for the corrupted brokers and loan officers to be fulfilling their duties—and doing the job for which they are being handsomely paid—to survey the market for multiple lenders and present their borrower clients with the best mortgage option.
- 142. As a former member of the National Association of Mortgage Brokers has stated: "I have been tracking rate sheets on wholesale lenders for 17 years, and I can tell you there's not one time in history, not one time close in history, when I can see consistently sending more than 40% of loans—and that's generous, usually it's closer to 20% or 30%—to any one lender." Another professional in the mortgage lending industry, who provided over \$2.6 billion in loans in 2023, stated that brokers should generally be working with "seven to ten" lenders, but in no event should be working with any fewer than "three to five." These assessments are consistent with published guidance of AIME that independent brokers should not be originating more than 31.4% of loans with any single wholesale mortgage lender. *See supra* Section II.

- 143. But for UWM's tactics, the Ohio brokers who do business with UWM would have maintained their independence and acted on behalf of their clients—not UWM—including by evaluating options from multiple lenders to offer their borrowers economically advantageous mortgages. However, because of UWM's tactics, hundreds of Ohio brokers have represented to borrowers that they would act that way, but then instead acted with loyalty to UWM (not their clients), abandoned their duties to their clients, and funneled increasingly higher percentages of their business to UWM alone. The upshot is that if UWM borrowers had worked with Ohio brokers that did not participate in the UWM scheme, those borrowers would have obtained the services they sought when they entered into the wholesale channel to begin with, including obtaining the benefit of having a professional acting independently and on their behalf to place them into more competitively priced mortgages. Instead, UWM borrowers in Ohio are on the hook for millions of dollars in excessive fees and costs.
- 144. UWM's representations at the core of its advertising and marketing materials (including those made through the brokers it provides them to)—that "brokers are better" because they are "not captive or connected" to any one lender, and instead "independently shop" to get borrowers the "best deal"—are therefore false. The data demonstrates that brokers in UWM's network are captive, they are not independently shopping, and they certainly are not getting borrowers the "best deal." These representations are not false by coincidence—they are false because UWM and its corrupted Ohio brokers structure their relationships for the purpose of making those representations false.
- 145. Further, the Ohio brokers who have conspired with UWM in this way are an identified group. UWM monitors the activities of the brokers in the wholesale channel, including the rates at which they funnel loans to UWM and which brokers agree to the "All In" ultimatum.

UWM therefore knows which brokers are participating in the scheme and which are not. They can also be identified in the publicly available data. For example, attached as Appendix B is a list of 45 loan officers who funneled over 75% of their loans to UWM from 2021-2023 and are in the 75th percentile of total volume of loans brokered. According to the data, over that period, these loan officers funneled 4,135 loans to UWM with a total value of over \$958 million. These and other core participants in the scheme and enterprise are known, tracked, and identified. And Appendix A reflects a non-exhaustive collection of examples of Ohio loan officers and Ohio brokers who have funneled over 75% of their loans to UWM—including many loan officers listed in Appendix B—participating in the misleading and deceptive marketing messages that they and UWM have conspired to disseminate in furtherance of the scheme.

146. UWM has reaped enormous rewards from the increasing prevalence of Ohio brokers' loan funneling conduct, which it deliberately causes and substantially assists through its business practices. The increases in loan funneling within UWM's Ohio broker network have translated directly into increases in market share, fueling and sustaining the company's position as the originator of more than 43.9% of all broker-originated mortgages loans in Ohio.

147. For Mathew Ishbia, somebody driven by a relentless desire for UWM to be recognized as "number one," attaining that distinction was a massive personal and professional triumph. It also earned him bragging rights in his bitter rivalry with fellow billionaire and NBA team owner Dan Gilbert, the founder and owner of Rocket Mortgage. In a November 2022

¹⁰⁴ The list of loan officers in Appendix B has been anonymized to the extent any of the loan officers listed therein are not identified in this First Amended Complaint as having brokered Plaintiffs' UWM loans. Plaintiffs are prepared to identify each of the loan officers listed in Appendix B if the Court would like.

voicemail Mathew Ishbia left for the CEO of AIME (a UWM-bankrolled broker trade group) which reveals his mindset and motivations, Mathew Ishbia said of Gilbert and Rocket Mortgage:

"We fucking took those cocksuckers down. Fuck them. And we're gonna keep fucking sticking it to them forever. Fuck those guys. We're number one. We kicked the shit out of them. Brokers are number one. UWM is number one. You're number one. We're all number one together. And fuck them. I fucking hate them with all my heart. And we're gonna keep kicking their ass every fucking day..." 105

- 148. UWM's aggressive business practices and market share growth have translated into increasing revenue for UWM directly at borrowers' expense. According to an analysis of publicly available data, between 2021 and 2023, UWM dramatically drove up closing costs for borrowers by charging substantially higher origination fees than its competitors, particularly with respect to loans originated through brokers who steer a majority of their business to UWM. The data establishes, moreover, that the more a broker funnels loans to UWM, the more the borrowers on those loans overpay. For example, in 2022, Ohio borrowers who obtained a mortgage loan through a broker who funnels 50% of her loans to UWM paid, on average, hundreds of dollars more in origination fees than the median amount of origination fees in the wholesale market for comparable loans, while Ohio borrowers who got a loan from a 99% steerer paid over a thousand dollars more.
- 149. If Ohio mortgage brokers were not conspiring with UWM to perpetrate its scheme and instead were actually shopping in a functioning wholesale market, UWM would also have a strong incentive to lower its origination fees to make its offerings more competitive relative to other lenders. A large mortgage company like UWM should have a *greater* ability to drive its overall origination costs down by capitalizing on efficiencies and economies of scale to offset

¹⁰⁵ From FB Group Rocket Pro TPO vs UWM: Voicemail Mat Ishbia left Anthony Casa., Reddit, Feb. 24, 2024, https://www.reddit.com/r/pillar7/comments/1ay3wcb/from_fb_group_rocket_pro_tpo_vs_uwm_voicemail_mat/ (accessed Mar. 7, 2025).

overhead expenses related to loan administration and processing. These dynamics make UWM's substantially higher origination fees all the more jarring.

- 150. In the aggregate and when controlling for interest rate and loan type, between 2021 and 2023, Ohio UWM borrowers who got a mortgage through brokers who send at least 75% of their business to UWM paid at least \$298 more in origination fees than those borrowers would have if their brokers had simply shopped around and obtained a loan for them with the median amount of origination fees.
- 151. But as UWM represents to the public, independent brokers have a duty not merely to find a median deal for their clients—rather, they have a duty to shop around to find them the best deal they can. If the brokers who send 75% or more of their loans to UWM had actually shopped around to find their borrowers the best deal possible—*i.e.*, a loan with the lowest origination fees available on the market—those borrowers would have saved, in the aggregate, well over \$25.9 million. As a direct and proximate result of UWM's scheme, UWM and its corrupted Ohio brokers have profited, and Ohio borrowers have lost millions of dollars.

VI. Brokers Who Participate in UWM's Scheme Work Collectively to Advance Shared Goals

- 152. The Ohio brokers who participate in this scheme do so pursuant to a common understanding that they share with one another and with UWM: namely, that they will act in furtherance of UWM's strategy by (a) funneling high proportions of loans to UWM, (b) concealing from borrower-clients their UWM-funneling and failure to shop around, and (c) in so doing, avoid exposing their co-conspirator brokers as UWM loyalists, which would undermine the corrupted brokers' ability to compete and thus undercut the scheme's effectiveness.
- 153. Brokers' conduct in furtherance of UWM's scheme demonstrates their participation in concerted, conspiratorial activity.

154. The brokers who participate in the UWM scheme act collectively and in uniform ways. They each funnel high proportions of their loans to UWM to impose higher-than-market costs on their clients. They falsely claim to be "independent" mortgage brokers, ¹⁰⁶ and they often covertly use UWM-provided marketing materials to accomplish that purpose. They are subject to the central control of UWM, including through its Wholesale Broker Agreement—and consistent with that Agreement, they each have refrained from placing a loan with Rocket Mortgage or Fairway Mortgage on or after March 15, 2021.

155. Additionally, in furtherance of UWM's scheme, brokers systematically conceal material information from their borrower-clients such that borrowers are uniformly underinformed or misinformed when they reach the closing table. Among other things, brokers who participate in the scheme fail to disclose:

- a. the fact that they are bound, under UWM's Wholesale Broker Agreement, to not shop for or present loans from Rocket Mortgage or Fairway Independent Mortgage;
- b. the fact that they are bound, under UWM's Wholesale Broker Agreement, to not shop for or present loan options from any other lender once the borrower's interest rate has been locked;
- c. the fact that they face penalties and/or legal exposure for violating any terms in UWM's Wholesale Broker Agreement that restrict their ability to independently shop;
- d. the fact that, in exchange for originating a larger proportion of their loans with UWM, they are eligible to receive valuable perks and benefits from UWM, including meals, trips, gifts, apparel, entertainment, awards, referrals, access to

¹⁰⁶ See Appendix A.

- preferential loan products and discounts, and/or access to preferential placement on UWM's broker search engine;
- e. the fact that they use marketing materials that were produced, created, or otherwise reviewed and approved by UWM;
- f. the fact that UWM's loans are often more expensive than substantially similar alternatives from other lenders in the wholesale market;
- g. the fact that, as a result of UWM's system of contractual restrictions and incentives, they have conflicts of interest that can impact their performance of services on behalf of their clients;
- h. the fact that they are not independently shopping for loans in the borrower's best interest; and/or
- the fact that they originate the vast majority, or in some cases virtually all, of their loans with UWM.
- 156. Had UWM or the brokers not made affirmative misrepresentations and/or disclosed these and other material facts to Ohio borrowers, those borrowers would not have closed on their mortgages or agreed to the disclosure forms presented to them at closing. On information and belief, that is *why* UWM and the brokers do not disclose those facts—such disclosure fundamentally would undermine their scheme.
- 157. The brokers who participate in the UWM scheme take action that would contravene their own self-interest absent the conspiracy to conceal the scheme from prospective borrowers. Brokers must be independent and shop from a variety of lenders to be competitive in the wholesale broker market. Thus, in the ordinary course, it would be against a broker's self-interest to funnel the vast majority of loans to one lender, assuming that material facts were disclosed to prospective

clients. After all, prospective borrowers are paying their broker a fee to shop around to multiple lenders. Prospective borrowers would be highly likely to find and choose a different broker who *is* offering more affordable loan products, and the UWM-captive brokers would not be able to compete. But, armed with the knowledge that UWM and other conspiring brokers would conceal and not disclose this scheme to the market, these conspiring brokers participate in the scheme to enrich themselves and to avoid UWM-imposed penalties.

- 158. Indeed, UWM-captive brokers know that a significant and growing population of brokers are likewise captive to UWM and likewise failing to present more affordable loan products from non-UWM lenders to their clients, including through their knowledge of the terms of the Wholesale Broker Agreement, their attendance at UWM-sponsored events, their communications with other brokers, their communications with UWM, and their full knowledge of the handsome rewards (and severe punishments) that UWM hands out to keep brokers in line.
- 159. With that knowledge, these funneling brokers can freely act in ways that ordinarily would be against their own self-interest because they are reasonably assured that the economic benefits of participating in the scheme will outweigh the potential detriments of losing business to the shrinking proportion of brokers who are truly independently shopping. Moreover, but for the coordination and concerted action between and among the brokers and UWM, it would be easier to expose the scheme.
- 160. The funneling activity of these brokers and loan officers marks an abrupt shift in behavior compared to market practices before UWM started implementing its scheme. Historically, wholesale brokers competed with each other based on their independence and ability to shop across the wholesale lender market on their clients' behalf. The better terms they could obtain for their clients by leveraging competition among numerous wholesale lenders, the more

their client following grew, and the more revenue they could generate. Now, however, the market has changed dramatically. UWM has now put a scheme in place whereby UWM and these brokers grow their revenues and market share without having to shop around—but it relies on misrepresentations and material omissions made to consumers and breaches of duties owed to them under state and federal law. As a result, the prevalence of loan funneling and UWM's market share have increased precipitously within a compressed period of time, and the participating brokers have been enriched, all to the consumer's detriment.¹⁰⁷

- 161. The brokers and loan officers who participate in the UWM scheme share a common motive: to induce prospective borrowers to enter the wholesale market channel, to increase the total number and volume of loans they originate despite failing to provide loans at competitive rates and costs, and to thereby increase the commission and fee revenue they are able to generate. UWM and each of these brokers pursue this shared goal, including by cooperating to deploy deceptive marketing materials into the marketplace, concealing the reality of these corrupted brokers' relationship with UWM, and failing to disclose these material facts at any stage of their work purportedly on behalf of prospective borrowers, all in breach of their legal obligations under Ohio law.
- 162. To justify their uniform conduct favoring UWM, brokers and loan officers who participate in the scheme often use the same pretextual justifications for why UWM earns disproportionate amounts of business, even if consumers end up paying higher costs and/or fees for UWM loans. But none of those justifications withstand scrutiny. For example:

 $^{^{107}}$ See Figure 9 and Figures 23-25.

- a. UWM and funneling brokers often claim that UWM offers "easier approval processes." But UWM's denial rates are comparable to those of other wholesale lenders.
- b. UWM and funneling brokers often claim that UWM offers superior "state of the art" technology and client services. But much of the purportedly "state of the art" technology UWM provides is matched by other wholesale brokers, and the value that UWM's technology and client services provide to brokers and loan officers does not necessarily translate to the borrower, who is ultimately the broker's client to whom the broker owes fiduciary duties.
- c. UWM and funneling brokers often claim that UWM offers faster turn times and a more efficient underwriting process. But other wholesale lenders offer comparable or faster turn times on applications. And UWM expressly reserves its fastest guaranteed turn times only for loan officers who achieve PRO Elite status, which the loan officers achieve by funneling high proportions of their loans to UWM in the first instance.
- d. Moreover, none of UWM's pretextual justifications even purport to explain why it would be necessary for brokers to mislead consumers with false representations of "independence" and to conceal the true nature and extent of their relationship with UWM. The reality is they mislead prospective borrowers and conceal that these brokers are not independent because (i) if they disclosed that information, they would cease to be competitive in a market that prospective borrowers enter into *because* of the promise of having an independent broker working on the borrower's behalf; (ii) those brokers would

cease to be able to funnel high volumes of loans to UWM; and (iii) the commercial purpose of the scheme—to inflate UWM's and these brokers' deal-flow and revenues based on deception—would be thwarted.

- 163. The brokers and loan officers who participate in the UWM scheme have numerous opportunities to coordinate, collaborate, and exchange information in furtherance of their collective activity. In particular:
 - a. UWM strongly encourages in-person visits to its campus in Pontiac, Michigan and attendance at broker training and networking events. As part of its LO Partner Points and PRO Rankings programs, UWM offers loan officers increasing numbers of "points" toward their PRO Ranking status for visiting the campus multiple times in a 12-month period—25 points for two visits, 30 points for three visits.
 - b. UWM hosts its annual UWM LIVE! event, which convenes thousands of brokers in one place to exchange information on market intelligence and best practices on marketing and technology use.
 - c. UWM sponsors¹⁰⁸ and provides funding, organization, and support for numerous networking and training events hosted by AIME, including AIME's annual "Fuse National Conference," which AIME calls the "largest annual gathering of independent mortgage professionals in the country." ¹⁰⁹
 - d. Additionally, brokers and loan officers often coordinate, collaborate, and exchange information online, including on social media platforms like Reddit and Facebook. For example, when UWM announced its "All In" policy, it did so during a virtual

¹⁰⁸ Sponsors, https://aimegroup.com/sponsors/ (accessed Sep. 26, 2024).

¹⁰⁹ Events, https://aimegroup.com/events/ (accessed Mar. 7, 2025).

Facebook Live meeting with brokers, which UWM convened and hosted on its Facebook page. ¹¹⁰ During the meeting, brokers interacted with UWM personnel and one another, including by posting comments encouraging adherence to UWM's scheme and inviting collusion, such as:

- i. "We are ALL IN";¹¹¹
- ii. "We are all family! Brokers are better when we work together"; 112
- iii. "Brokers are family. We don't go against our family";113
- iv. "You're either with the captain [UWM] or off the boat";¹¹⁴
- v. "TEAM BROKER BABY!;"115 and
- vi. "BROKERS---WAKE UP!!!! Stop sending files to the enemy! Protect your book of business" 116
- 164. As a result of these corrupted brokers cooperating within UWM's scheme, brokers recognize and talk about what the data plainly shows: that there are now two categories of brokers in the wholesale mortgage market, UWM brokers and everybody else. Wholesale brokers have even taken to referring to corrupted UWM brokers as effectively being retail arms of UWM.
- 165. Thus, in a context where UWM and these brokers are inducing prospective borrowers to enter the wholesale channel rather than the retail channel on the promise of getting

https://www.facebook.com/UnitedWholesaleMortgage/videos/state-of-the-industry-and-uwms-jumbo-relaunch/845176203005957/ (accessed Mar. 7, 2025).

¹¹¹ *Id.* at 15:39.

¹¹² *Id.* at 9:42.

¹¹³ *Id.* at 11:32.

¹¹⁴ *Id.* at 12:49.

¹¹⁵ *Id.* at 13:11.

¹¹⁶ *Id.* at 11:18.

the benefit of an "independent" wholesale mortgage broker to work on their behalf, UWM and these brokers are working together to implement a business model that is predicated on providing those prospective borrowers exactly the opposite of what they came for: an experience where the loan officer that they hire as an "independent" advisor is effectively a retail arm of UWM, working toward the lender's and the broker's interests, rather than the borrower's. Put differently, through this scheme, UWM is leveraging the upside of operating in the wholesale channel by marketing to prospective borrowers (including through the brokers) the benefit of working with independent brokers in the wholesale channel, while growing its revenues and market share by surreptitiously implementing a retail channel model through which an army of loyalist brokers effectively operate as its retail loan officers and funnel unknowing borrowers into UWM loans. In these ways, among others, UWM and these corrupted brokers are functioning as a continuous unit, with a unity of purpose, and within a superstructure that UWM centrally controls to deceive prospective borrowers in furtherance of UWM's scheme.

VII. UWM Has Conspired with Brokers in Ohio to Funnel Clients into UWM Loans

A. Broker 1

- 166. Broker 1 is an Ohio mortgage broker who has worked in the mortgage industry for approximately 12 years.
- 167. According to information available through the Nationwide Multistate Licensing System ("NMLS"), Broker 1 holds mortgage loan originator licenses in four states: Florida, Kentucky, Tennessee, and Ohio.
- 168. Beginning in March 2019, Broker 1 opened a branch of Motto Mortgage Apex, a Denver, Colorado-based mortgage company, in Beavercreek, Ohio, where he worked as a loan officer. In December 2022, Broker 1's Motto Mortgage Apex was acquired by UMortgage, where

Broker 1 worked as a branch manager and loan officer, doing business as UMortgage Cincy, until May 2023. On or around May 2023, Broker 1 started UMC Capital, alternatively doing business as UMCincy, as a managing partner and loan officer. Since May 2024, Broker 1 and UMC Capital have been affiliated with Go Rascal, Inc., a mortgage broker based in Brooklyn, New York.

169. Broker 1's previous firm, UMortgage, which is a large and supposedly "independent" mortgage broker based in Philadelphia, Pennsylvania, is a shell company financed by UWM. Alex Alezaj, currently UWM's Chief Strategy Officer and board member, owned UMortgage until at least 2020. Since 2021, UMortgage sent 77% of all of its originated loans to UWM, totaling an estimated \$1.9 billion in loan volume. UMortgage currently operates in 48 states, including Ohio. During Broker 1's employment, UMortgage Cincy became one of the UMortgage's top-performing branches in the United States. 117

170. As a broker who originates loans with UWM, Broker 1 was required to agree to the terms of UWM's Wholesale Broker Agreement, including: (a) the "All In" provision, which had the intended practical effect of preventing brokers from telling borrowers about lower-priced loan products offered by UWM's chief competitors, and which prohibited brokers from originating loans with UWM's chief competitors; and (b) the "Lock In" provision, which had the intended practical effect of preventing brokers from telling borrowers about their rights to continue shopping for better rates after obtaining a locked-in price quote from UWM, and which prohibited brokers from originating a loan with any other lender after obtaining a locked-in price quote from UWM.

https://www.nationalmortgagenews.com/news/a-top-umortgage-branch-breaks-away-to-start-its-own-shop (accessed Mar. 7, 2025).

- 171. Broker 1, through his personal social media accounts and his companies' websites, has consistently promoted himself as an "independent" mortgage broker who works with clients to find the best prices available.
- 172. In July 2023, Broker 1 represented on his LinkedIn page: "[B]rokers have access to a wide network of lenders, enabling them to find more diverse and competitive mortgage options tailored to individual needs."
- 173. Despite his representations, Broker 1 does not shop for mortgage options across a wide network of lenders on behalf of his clients. In reality, Broker 1 has been one of the largest and highest compensated brokers loyal to UWM.
- 174. In 2020, Broker 1 funneled 155 Ohio mortgages out of his total 164 mortgages to UWM—a 95% funneling rate, and a loan volume of \$39,833,118. In 2021, after UWM required brokers to sign its "All In" provision, Broker 1 funneled 100% of 226 Ohio borrowers' loans to UWM, or \$61,246,790 in loan volume. In 2022, Broker 1 funneled 98%, or 167 total Ohio home loans, to UWM, totaling \$45,128,864. In 2023, Broker 1 funneled approximately 85% of his 180 loans that year to UWM.¹¹⁸
- 175. On UMCincy.com, the website for Broker 1's company UMC Capital, Broker 1 uses a UWM template hosted by LenderHomePage.com, the platform through which UWM provides marketing language and promotional assets to funneling brokers.¹¹⁹ Broker 1's website

¹¹⁸ In 2023, UMortgage operated what is known as a "correspondent model." In this instance, a correspondent model meant UMortgage initially sent many of its clients' loans to an independent warehouse credit facility, but the actual underwriting decision was made by UWM. Once the loan went to the independent warehouse credit facility, UWM would then buy the loan from the brokerage. Combining the loans Broker 1 sent to UWM directly and the loans Broker 1 sent through the warehouse credit facility to UWM, his 2023 funneling percentage was 85%.

¹¹⁹ https://www.umcincy.com/ (accessed Sep. 26, 2024).

parrots UWM talking points, including posting frequent UWM-originated articles on UMCincy.com's "Blog" section. 120

176. In September 2022, while still working at Motto Mortgage, Broker 1 appeared as a guest on an episode of UWM's podcast, "Good. Better. Broker." The podcast's marketing states: "What does it take to succeed in the mortgage industry? Brokers who are 'All In' with United Wholesale Mortgage know better than anyone and want to share their knowledge with you[.]" 121 In the episode titled "Mindset Over Market," Broker 1 told host Justin White: "[Realtors say], 'Hey, [Broker 1's] the expert. Call him. He's gonna get you the best possible deal. I don't know what rates are, but I just know his are lower than everyone else's.' And, you know, that just sets us up to where now, I can focus on doing what's best for the client instead of trying to explain to the client who I am and where I fit into the process." 122

177. Despite holding himself out as an independent broker, Broker 1's clients were routinely funneled to UWM, where they were charged for loans or costs significantly above those offered by other lenders, including lenders that he was required to boycott under UWM's Wholesale Broker Agreement.

178. In 2020, Broker 1's clients were charged an average of \$1,231 more for their respective loans when compared to the median loans available to comparable borrowers, according to analysis of HMDA data. Similarly, in 2021, Broker 1's clients paid \$1,367 more than the median. In 2022, Broker 1 charged his clients \$768 per loan more than the median. And in 2023, Broker 1's borrowers paid \$1,198 more than similar borrowers for comparable loans.

¹²⁰ https://www.umcincy.com/blog?page=1 (accessed Sep. 26, 2024).

¹²¹ https://www.uwm.com/good-better-broker/026 (accessed Sep. 26, 2024).

¹²² *Id.* at 9:05-9:23.

179. Between 2020 and 2023, Broker 1 funneled approximately 627 Ohio home loans to UWM, worth \$168,470,457. Rather than working independently to get clients the best mortgage rate, Broker 1 is a UWM loyalist.

B. Broker 2

- 180. Broker 2 is an Ohio mortgage broker who has worked in the mortgage industry for 20 years. Since October 2019, Broker 2 has been the Chief Executive Officer and President of Summit Home Lending LLC, a mortgage brokerage based in Hudson, Ohio.
- 181. Summit Home Lending markets itself as an "independent" mortgage broker and a "small, family-owned company."¹²³
- agree to the terms of UWM's Wholesale Broker Agreement, including: (a) the "All In" provision, which had the intended practical effect of preventing brokers from telling borrowers about lower-priced loan products offered by UWM's chief competitors, and which prohibited brokers from originating loans with UWM's chief competitors; and (b) the "Lock In" provision, which had the intended practical effect of preventing brokers from telling borrowers about their rights to continue shopping for better rates after obtaining a locked-in price quote from UWM, and which prohibited brokers from originating a loan with any other lender after obtaining a locked-in price quote from UWM.
- 183. In borrower-facing materials, Summit and Broker 2 have consistently touted their independence as mortgage brokers. In borrower-facing statements on Broker 2's social media accounts, for example, Broker 2 describes the services he provides through Summit as "shopping multiple lenders" and "exploring multiple loan programs." On Broker 2's personal LinkedIn in

¹²³ https://summithomelending.com/ (accessed Mar. 7, 2025).

March 2021, he stated: "As an independent mortgage broker, we rely on our wholesale lender partners to compete for our business. Providing options, fast closings and great rates is why you choose a local broker."

- 184. Despite these statements claiming that Broker 2 and Summit are independent brokers working toward their clients' best interests, in reality, Broker 2 and Summit funnel the majority of their clients' loans to UWM.
- 185. Publicly available data confirms Broker 2's loyalty to UWM. In 2021, the year the "All In" provision went into effect, Broker 2's funneling rate to UWM skyrocketed to 97% of all loans he generated. In 2022, Broker 2 funneled 96% of his clients' loans to UWM. In 2023, Broker 2 had a 77% funnel rate to UWM. Broker 2 generated 309 loans to UWM from 2020 through 2023, with a total loan volume of \$74,390,093.
- 186. In addition to commissions for these loans, Broker 2 received UWM perks in exchange for his fealty to UWM. Broker 2, for instance, received preferential treatment by UWM's search engine, MortgageMatchup.com, appearing as one of the first brokers on searches for the Akron, Ohio, area.¹²⁴
- 187. According to publicly available data, Broker 2 not only funneled borrowers to UWM, but did so even when UWM loans were more expensive than other loans available to his clients. In 2020, Broker 2 borrowers were charged an average of \$1,357 more per loan than the median for comparable borrowers who purchased similar loans. In 2021, Broker 2's clients were charged \$745 more than the median. In 2022, Broker 2 charged \$312 more per loan for the 76 borrowers he funneled to UWM that year. And in 2023, Broker 2's clients were charged \$1,140 more per loan on average.

¹²⁴ mortgagematchup.com/search?query=Akron%2C+Ohio (accessed Mar. 7, 2025).

188. The same is true of Summit as a broker. According to publicly available information, from 2021-2023, Summit funneled 94% of its clients into UWM loans. Based on the publicly available information, those clients paid more for their loans than the median amount paid for comparable loans. In 2021, its clients paid \$1,834 more on average. In 2022, Summit's clients paid \$732 more for UWM loans than the median. In 2023, Summit's clients funneled into UWM loans paid \$1,140 more on average for their loans. In total, from 2021-2023, Summit funneled 219 borrowers into UWM loans with a collective value exceeding \$50 million.

189. Although Broker 2 and Summit claim to be independent, they are UWM loyalists who did not survey "multiple lenders" or require wholesale mortgage lenders to "compete for" their business. Instead, during the relevant period, Broker 2 and Summit funneled nearly all the borrowers who came to them into UWM loans, regardless of the borrowers' best interests.

C. Broker 3

- 190. Broker 3 is an attorney and, since 2021, according to NLMS, a licensed mortgage broker in Ohio. She holds the titles Executive Vice President and general counsel at FirstCapUS, a mortgage broker based in Columbus, Ohio.
- 191. FirstCapUS holds itself out as an "independent mortgage company" that "finds the best rate" for its clients by searching "hundreds of lenders." The company claims it has access to "a full array of lenders that may only partner with us and not deal directly with the consumer," allowing FirstCapUS to "bid the loan out to ensure you get the best deal." Broker 3 serves on FirstCapUS's "leadership team."
- 192. In reality, Broker 3 is a UWM loyalist who has funneled clients to UWM despite assertions that she and FirstCapUS are "independent."

¹²⁵ https://firstcapus.com/about/ (accessed Mar. 7, 2025).

193. As a broker who originates loans with UWM, Broker 3 was required to agree to the terms of UWM's Wholesale Broker Agreement, including: (a) the "All In" provision, which had the intended practical effect of preventing brokers from telling borrowers about lower priced loan products offered by UWM's chief competitors, and which prohibited brokers from originating loans with UWM's chief competitors; and (b) the "Lock In" provision which had the intended practical effect of preventing brokers from telling borrowers about their rights to continue shopping for better rates after obtaining a locked-in price quote from UWM, and which prohibited brokers from originating a loan with any other lender after obtaining a locked-in price quote from UWM. According to publicly available data, from 2021—the first year Broker 3 was licensed to act as a mortgage broker on behalf of Ohio borrowers—through 2023, 100% of Broker 3's clients were funneled to UWM. In other words, Broker 3 sent \$46,499,717 of loan volume to UWM in three years, a total of 183 individual loans.

194. In exchange for this loyalty, UWM gave Broker 3 first-page placement on MortgageMatchup.com in the Columbus, Ohio, area.¹²⁶

Broker 3's unwavering loyalty to UWM has come at the expense of her clients. As Broker 3 funneled all of her borrowers to UWM, those borrowers have paid more for their loans than the average paid for similar loans. In 2021, Broker 3's clients were charged \$495 more per loan than the median for comparable loans. In 2022, Broker 3's charges rose to an average of \$2,311 more than the median that year. In 2023, the 57 borrowers Broker 3 funneled to UWM paid \$257 more per loan than similar borrowers.

¹²⁶ https://mortgagematchup.com/search?query=columbus+ohio&page=1 (accessed Sep. 26, 2024).

196. Despite holding herself out publicly as working on behalf of her borrower-clients, the data is clear: Broker 3's primary loyalty is to UWM.

D. Broker 4 and Above & Beyond

- 197. Broker 4 is an Ohio mortgage broker who has worked in the financial industry for approximately 17 years.
- 198. In 2017, according to NMLS, Broker 4 was licensed as a mortgage loan originator for Above & Beyond Mortgage Company, doing business as Motto Mortgage Above & Beyond, an entity based in Cleveland, Ohio.
- 199. Above & Beyond and Broker 4 have held him out in borrower-facing materials as an independent broker. As a YouTube video from Above & Beyond states: "We work for you, the borrower, not the bank. Independent mortgage brokers like us have flexibility to shop rates from multiple lenders with unmatched earning potential and offer you the best rates possible." 127
- 200. On its website, Above & Beyond states that Broker 4 is "part of a national network that has some of the best mortgage lender relationships around," which means he "can compare hundreds of home loans from mortgage lending companies nationwide." 128
- 201. But Broker 4 does not "compare hundreds of home loans" for his clients. Rather, he has sent nearly every borrower he claims to serve directly to UWM.
- 202. According to publicly available information, Broker 4 has funneled approximately 95% of the loans he originated to UWM since 2021, the year UWM's "All In" provision went into effect. From 2021 to 2023, Broker 4 delivered 229 Ohio borrowers' loans to UWM, a loan volume of \$48,055,599.

¹²⁷ https://www.youtube.com/watch?v=pimLjVL7bSE (00:16–00:31) (accessed Mar. 7, 2025).

 $^{^{128}\,}$ https://www.mottomortgage.com/offices/above-beyond-westlake/about-us (accessed on Mar. 7, 2025).

203. UWM has recognized Broker 4's loyalty. For example, in 2023, Broker 4 received "PRO Elite Status," an acknowledgement of the high volume of loans he funneled to UWM. PRO Elite Status brokers receive special benefits from UWM, including preferential listing on the UWM-driven search engine MortgageMatchup.com. A search on MortgageMatchup.com for the Westlake area in which Broker 4 and his Above & Beyond branch operate lists Broker 4 at the top of a page of 63 brokers.¹²⁹

204. Publicly available data shows that borrowers who were funneled into UWM by Broker 4 paid more for their loans than the median amount paid for comparable loans. In 2021, his borrowers paid \$1,096 more on average. In 2022, Broker 4's borrowers were charged \$605 more for UWM loans than the median. And in 2023, the 71 borrowers Broker 4 funneled into UWM loans each paid \$1,145 more on average for their loans.

205. The same is true of Above & Beyond as a broker. According to publicly available information, from 2021 to 2023, Above & Beyond funneled 95% of its clients into UWM loans. Based on publicly available information, those clients paid more for their loans than the median amount paid for comparable loans. In 2021, its clients paid \$1,129 more on average. In 2022, Above & Beyond's clients paid \$660 more for UWM loans than the median. In 2023, the Above & Beyond clients funneled into UWM loans paid \$1,121 more on average for their loans. In total, from 2021 to 2023, Above & Beyond funneled 234 borrowers into UWM loans with a collective value exceeding \$50 million.

206. As a broker who originates loans with UWM, Broker 4 and Above & Beyond were required to agree to the terms of UWM's Wholesale Broker Agreement, including: (a) the "All In"

¹²⁹ https://mortgagematchup.com/search?query=Westlake+Ohio&page=1 (accessed Sep. 26, 2024).

provision, which had its intended practical effect of preventing brokers from telling borrowers about lower priced loan products offered by UWM's chief competitors, and which prohibited brokers from originating loans with UWM's chief competitors; and (b) the "Lock In" provision which had the intended practical effect of preventing brokers from telling borrowers about their rights to continue shopping for better rates after obtaining a locked-in price quote from UWM, and which prohibited brokers from originating a loan with any other lender after obtaining a locked-in price quote from UWM.

207. Broker 4 and Above & Beyond are not independent mortgage brokers as he and Above & Beyond claim. Rather, they are UWM loyalists who funneled nearly all of their clients straight to UWM for their own enrichment.

VIII. After UWM Borrowers Filed a Class Action in Michigan, UWM Perpetuated Its Scheme and Continues to Misrepresent the Nature of Its Relationship with the Corrupted Brokers

208. On April 2, 2024, a putative class of UWM borrowers filed a class action against UWM in the United States District Court for the Eastern District of Michigan. 130

209. One week after that action commenced, UWM issued a statement addressed to its "Partners"—*i.e.*, mortgage brokers who continue to funnel loans to UWM. In the statement, UWM does not dispute that thousands of brokers are directing the vast majority of their clients into UWM loans. Instead, it purports to now embrace that fact, stating that:

It is not uncommon nor illegal for a broker to send most or all of their business to a specific lender. This is not unique to UWM brokers. Nor this industry. UWM is audited by multiple regulators and organizations every year including FHFA, Fannie Mae and Freddie Mac and every year [sic] and there are zero findings like what is being presented in this shallow article and subsequent lawsuit. We are 100% confident nothing needs to change or will change.... The only way they win is if UWM or brokers change behavior.¹³¹

210. Additionally, in its statement, UWM makes an explicit offer to pay attorneys' fees and other defense costs for any brokers who may be called to serve as witnesses in the action, or who otherwise need representation in connection with the action. Specifically, the statement provides:

If any of our Partners get roped into their frivolous lawsuit, UWM will cover your attorneys' fees in connection with these fraudulent claims. We have seen 'ambulance chasing' attorneys try to scare consumers and brokers. We will be there to defend you. Keep focused on building your business they way you have been for years

 $^{^{130}}$ See Escue, et. al., v. United Wholesale Mortgage, et. al., No. 2:24-cv-10853 (E.D. Mich.).

¹³¹ Figure 26, @uwmlending, Instagram, Apr. 9, 2024, https://www.instagram.com/p/C5ipFCqsMc1 (accessed Mar. 7, 2025).

—the right way for consumers and brokers, and we will continue to grow and win together.¹³²

Figure 22

UWM Partners.

UWM is the No. 1 mortgage lender in the country for the last two years and the No. 1 wholesale lender for the last nine years. We built our reputation by supporting and advocating for mortgage brokers across the country. Recently our business, the wholesale channel, and our integrity were attacked. Under no circumstances will we stand silent and let anyone lob unfounded accusations against our community. We will always defend you, your hard work, and your integrity.

Some of you may have seen a ridiculous article (manufactured by a brand-new hedge fund called Hunterbrook) with obvious connections to Rocket Mortgage:

- The author, pretending to be a "journalist," worked at a Rocket Mortgage affiliated broker for the last 5 years, was actively
 working on this "report" while employed there, left 2 months ago to work for Hunterbrook and this just happened to be
 Hunterbrook's first scheme; and
- . Before launching its attack, Hunterbrook not only shorted UWM stock, it bought Rocket stock

The Hunterbrook attack contains numerous lies, including there being something wrong with brokers choosing to send most of their business to a specific lender. Mortgage brokers on average use 3-5 lenders and evaluate the various needs of each borrower including speed, service, rate and cost/fees. It is not uncommon nor illegal for a broker to send most or all their business to a specific lender. This is not unique to UWM brokers. Nor this industry. UWM is audited by multiple regulators and organizations every year including FHFA, Fannie Mae and Freddie Mac and every year and there are zero findings like what is being presented in this shallow article and subsequent lawsuit. We are 100% confident nothing needs to change or will change because of Hunterbrook's disinformation. The only way they win is if UWM or brokers change behavior.

If any of our Partners get roped into their frivolous lawsuit, UWM will cover your attorneys' fees in connection with these fraudulent claims. We have seen "ambulance chasing" attorneys try to scare consumers and brokers. We will be there to defend you. Keep focused on building your business the way you have been for years – the right way for consumers and brokers, and we will continue to grow and win together.

Our competitors have been abusing the court system since day one. Back in 2021, many claimed UWM was doing something wrong with the All-In initiative, asserting that it was against the law, antitrust rules were broken, and brokers shouldn't work with UWM because of it. The play didn't work then, and it won't work now. Fast forward three years and not only has the wholesale channel significantly grown and gained market share, UWM has been successful in each lawsuit resolved to date – including two separate federal judges ruling in February and March respectively that cases brought should be dismissed, affirming the soundness of this initiative.

Brokers' market share is now the highest in 15 years, and the average consumer saves thousands of dollars per loan when working with an independent mortgage broker rather than the retail channel. For example, the average 30-year fixed rate mortgage for 2023 as reported by Freddie Mac was 6.81%. The average rate for the \$97.6 billion of mortgages originated by UWM that were sold into Fannie Mae and Freddie Mac securities in 2023 was 6.51%.

Winners win, losers talk about winners. UWM and our Partners are winners. UWM remains focused on brokers and consumers and winning each day. There is one thing this "report" got correct – UWM is No. 1, and it is entirely because of all of you.



211. UWM's statement of April 9, 2024, is thus a transparent offer of value—cash—to brokers on the overt threat that the brokers would *lose* if they "change[d] behavior." The statement

 $^{^{132}}$ *Id*.

is part of a clear effort to induce those brokers to remain loyal and continue advancing the interests of the enterprise.

- 212. The class action complaint to which UWM's statement of April 9, 2024, was responding unmistakenly alleges that UWM's funneling brokers built their businesses in recent years by conspiring with UWM to deprive borrowers of the honest services they paid to receive. Thus, when UWM instructs its broker network to "[k]eep focused on building your business they way you have been for years," it is a clarion call for brokers to continue participating in the alleged unlawful conduct.
- 213. The statement also makes clear that UWM acknowledges no wrongdoing. To the contrary, UWM explicitly states "[w]e are 100% confident nothing needs to change or will change" and that "[i]t is not uncommon nor illegal for a broker to send most or all of their business to a specific lender."
- 214. Notwithstanding UWM's statement to its "Partners"—i.e., funneling brokers—that it is purportedly fine that they funnel clients to UWM, UWM continues to outwardly claim that its brokers do the opposite: that they independently shop around from hundreds of lenders to get the best loan for their clients. In fact, on April 23, 2024—twenty-two days after the Michigan class action complaint was filed and thirteen days after UWM instructed brokers to continue cooperating in the scheme (and offered to indemnify them for doing so)—UWM stated the following in a federal court pleading:

UWM is a Pontiac, Michigan-based wholesale mortgage lender that works exclusively with independent mortgage brokers and non-delegated correspondent lenders ("Broker Partners") across the country. UWM does not work directly with borrowers—as do retail lenders—until after a loan has funded. Rather, the Broker Partners communicate directly with borrowers and select from over 100

wholesale lenders to choose the lender and loan product they believe to the borrower's best option. 133

215. That is, of course, plainly inconsistent with the data showing that thousands of the "Broker Partners" are not shopping across "over 100 wholesale lenders" and that they are instead funneling loans to UWM. And it is plainly inconsistent with UWM, after having a class action filed against it in federal court, instructing its so-called "independent" "Broker Partners" to continue funneling loans to UWM and claiming that doing so is appropriate.

CLAIMS FOR RELIEF

COUNT 1

Violation of CSPA—Unfair or Deceptive Consumer Sales Acts or Practices, R.C. 1345.02

- 216. The State repeats and realleges the foregoing allegations as though they were fully set forth in this paragraph.
- 217. This Cause of Action is brought in the public interest under the CSPA and seeks a declaratory judgment that UWM has violated the CSPA, an injunction enjoining UWM's misrepresentations and deceptive conduct described in this Complaint, and an order for restitution to Ohio borrowers who were damaged by hiring a so-called "independent" broker in connection with purchasing their mortgages from UWM and therefore have been damaged by UWM's conduct, and civil penalties.
- 218. The CSPA prohibits "suppliers" from engaging in unfair or deceptive practices in connection with "consumer transactions." *See* R.C. 1345.01-02.

 $^{^{133}}$ United Wholesale Mortgage, LLC v. Madison Atrina LLC d/b/a District Lending, Case No. 2:23-cv-13176, ECF No. 17 at $\P\P$ 8-9.

- 219. Under R.C. 1345.01(C), "supplier" is defined as "a seller, lessor, assignor, franchisor, or other person engaged in the business of effecting or soliciting consumer transactions, whether or not the person deals directly with the consumer." Moreover, "[f]or purposes of this division, in a consumer transaction in connection with a residential mortgage, 'seller' means a loan officer, mortgage broker, or nonbank mortgage lender." R.C. 1345.01(C). Because UWM is a nonbank mortgage lender in a consumer transaction in connection with a residential mortgage, it is a supplier under R.C. 1345.01(C).
- 220. Under R.C. 1345.01(K), a "nonbank mortgage lender" is defined as: "any person that engages in a consumer transaction in connection with a residential mortgage, except for a bank, savings bank, savings and loan association, credit union, or credit union service organization organized under the laws of this state, another state, or the United States; a subsidiary of such a bank, savings bank, savings and loan association, or credit union; or an affiliate [that meets certain additional criteria]." UWM is neither a bank nor one of the similar banking entities identified in R.C. 1345.01(K) that are exempt from the CSPA and is accordingly a nonbank lender.
- 221. The FDIC defines "nonbank" as "[f]irms that are not part of or affiliated with FDIC-insured depository institutions." In addition, the FDIC defines a "nondepository financial institution" as "[a] more specific categorization of nonbanks, consistent with the definition provided in the instructions for the Call Reports, including real estate investment trusts, mortgage companies, finance companies, holding companies of other depository institutions, investment banks, Small Business Investment Companies, and other financial intermediaries." *See* https://www.fdic.gov/system/files/2024-07/2022-risk-review-glossary.pdf.
- 222. UWM is not part of, affiliated with, or regulated by the FDIC and is regularly characterized as a nonbank. See UWM 2023 Annual Report, at 29 ("We are subject to the

regulatory, supervisory and enforcement authority of the CFPB, which has oversight of federal and state non-depository lending and servicing institutions, including residential mortgage originators and loan servicers").¹³⁴

- 223. Under R.C. 1345.01(A), "Consumer transaction" means "a sale, lease, assignment, award by chance, or other transfer of an item of goods, a service, a franchise, or an intangible, to an individual for purposes that are primarily personal, family, or household, or solicitation to supply any of these things" and specifically includes "transactions in connection with residential mortgages between loan officers, mortgage brokers, or nonbank mortgage lenders and their customers." R.C. 1345.01(A)
- 224. Each borrower who purchased a residential mortgage from UWM is a "Consumer" under R.C. 1345.01(D) as a "person who engages in a consumer transaction with a supplier."
- 225. R.C. 1345.02(A) provides that "[n]o supplier shall commit an unfair or deceptive act or practice in connection with a consumer transaction. Such an unfair or deceptive act or practice by a supplier violates this section whether it occurs before, during, or after the transaction."
- 226. In violation of R.C. 1345.02(A), UWM engaged in a pattern of unfair or deceptive acts or practices in connection with consumer transactions, as alleged herein.
- 227. R.C. 1345.02(B) provides that, "[w]ithout limiting the scope of division (A) of this section, the act or practice of a supplier in representing any of the following is deceptive: (1) That

¹³⁴ See also "Nonbanks Reclaim the Throne", National Mortgage Professional, found at https://nationalmortgageprofessional.com/news/nonbanks-reclaim-throne ("This has negatively impacted bank market share given the fact the wholesale share of the market has been trending up, driven by a handful of nonbank lenders such as United Wholesale Mortgage (UWM).") (accessed Mar. 7, 2025); www.freep.com/story/money/business/2024/02/28/united-wholesale-mortgage-full-year-loss-fourth-quarter/72771467007/ ("UWM, a nonbank lender, said it did \$108 billion in total mortgage originations last year, down 15% from 2022.") (accessed Mar. 7, 2025).

the subject of a consumer transaction has sponsorship, approval, performance characteristics, accessories, uses, or benefits that it does not have; (2) That the subject of a consumer transaction is of a particular standard, quality, grade, style, prescription, or model, if it is not;...(4) That the subject of a consumer transaction is available to the consumer for a reason that does not exist;...(8) That a specific price advantage exists, if it does not[.]" *See* R.C. 1345.02 (B)

- 228. In violation of R.C. 1345.02(B)(1), UWM represented that the subject of a consumer transaction has sponsorship, approval, performance characteristics, accessories, uses, or benefits that it does not have, as alleged herein.
- 229. In violation of R.C. 1345.02(B)(2), UWM represented that the subject of a consumer transaction is of a particular standard, quality, grade, style, prescription, or model, that it is not, as alleged herein.
- 230. In violation of R.C. 1345.02(B)(4), UWM represented that the subject of a consumer transaction is available to the consumer for a reason that does not exist, as alleged herein.
- 231. In violation of R.C. 1345.02(B)(8), UWM represented that a specific price advantage exists, that did not exist, as alleged herein.
- 232. Such acts and practices have been previously determined by a court in Ohio to violate R.C. 1345.01 *et seq*. UWM committed said violation after such decisions were available for public inspection pursuant to R.C. 1345.05(A)(3). In addition, UWM's alleged deceptive acts and practices violated Ohio Admin. Code 109:4-3-10, as alleged above, and under R.C. 1345.07(A)(3)(c), the following acts are deemed to be deceptive pursuant to cases located within the Attorney General's Public Inspection File ("PIF"):
 - Entering a consumer transaction with a client knowing that the client is unable to receive a substantial benefit from the subject of the consumer transaction. *Lardakis v. Martin*, Case No. CV 94-01-0234 (Ct. Common Pleas, Summit).

- Accepting money for consumer services knowing that the consumer will not receive the services for which she has paid. *Lardakis*.
- Engaging in any fraudulent oral or written misrepresentations, or otherwise conveying factually incorrect information to clients. *Lardakis*.
- Failing to clearly and conspicuously disclose in close proximity to the words stating the offer any material exclusions, reservations, limitations, modifications, or conditions on its advertisements, including but not limited to any restrictions or conditions related to obtaining lower monthly mortgage payments. *State ex rel Dann v. Bluegrass Mortgage Service, Inc*, Case No. 07 10425 (Ct. Common Pleas, Montgomery) (consent decree)
- Knowing at the time that consumer transactions were entered into of the consumer's inability to receive a substantial benefit from the subject of the transaction and by making misleading statements of opinions upon which consumers relied to their detriment. *State ex rel Rogers v. Lavensky*, Case No. CV-07-632077 (Ct. Common Pleas, Cuyahoga)
- Making false or misleading statements including, but not limited to, representing that a defendant would negotiate with lenders to obtain modification of consumers' current mortgages which would result in lower monthly mortgage payments, lower interest rates and/or lower principal balances. *State ex rel. DeWine v. Rojas*, Case No. CV-12-780588 (Ct. Common Pleas, Cuyahoga) (default judgment)
- Accepting money from consumers for services, failing to provide those services, and failing to provide a refund. *Rojas*.
- Making misleading statements of opinions on which consumers relied upon to their detriment. *Rojas*.
- Entering into transactions with consumers while knowing the inability of consumers to receive substantial benefits from the service. *Rojas*.
- 233. UWM's steering scheme constitutes an unfair or deceptive act or practice. Collectively, UWM made hundreds of millions of dollars, if not over a billion dollars, by deceiving Ohio borrowers, and causing them to be deceived by their brokers.
- 234. Among other things, while representing that consumers are entitled to rely on "completely independent" brokers to shop for the best price, free from restrictions on their independent judgment, UWM was secretly causing, and conspiring with, brokers to violate their fiduciary duties to steer business to UWM. Through UWM's funding, promotion, and supporting

of its brokers' efforts to market themselves as "independent," borrowers believed and relied on the purported independence of these brokers.

- 235. UWM owed Ohio borrowers a duty to disclose the true facts about the influence UWM exerted over brokers because: (a) UWM possessed exclusive knowledge that brokers were not and could not have been shopping for the overall best prices on behalf of their clients; (b) intentionally concealed the foregoing from Ohio borrowers; and (c) made incomplete representations while purposefully withholding material facts that contradicted these representations.
- 236. Ohio borrowers suffered ascertainable loss caused by UWM's misrepresentations, false advertising, and failure to disclose material information. As a direct and proximate result of its acts and omissions as set forth herein, Ohio borrowers suffered actual damages in an amount to be determined at trial.
- 237. The State seeks a declaratory judgment that UWM has violated the CSPA, an injunction enjoining UWM's misrepresentations and deceptive conduct described in this Complaint, and an order for restitution to Ohio borrowers who were damaged by hiring a so-called "independent" broker in connection with purchasing their mortgages from UWM and therefore have been damaged by UWM's conduct, and civil penalties.

COUNT 2

Violation of Ohio Admin. Code 109:4-3-10

- 238. The State repeats and realleges the foregoing allegations as though they were fully set forth in this paragraph.
- 239. Under Ohio Admin. Code 109:4-3-10, "It shall be a deceptive act or practice in connection with a consumer transaction for a supplier to: (A) Make any representations, claims, or

assertions of fact, whether orally or in writing, which would cause a reasonable consumer to believe such statements are true, unless, at the time such representations, claims, or assertions are made, the supplier possesses or relies upon a reasonable basis in fact such as factual, objective, quantifiable, clinical or scientific data or other competent and reliable evidence which substantiates such representations, claims, or assertions of fact[.]"

- 240. Under R.C. 1345.01(C), "supplier" is defined as "a seller, lessor, assignor, franchisor, or other person engaged in the business of effecting or soliciting consumer transactions, whether or not the person deals directly with the consumer." Moreover, "[f]or purposes of this division, in a consumer transaction in connection with a residential mortgage, 'seller' means a loan officer, mortgage broker, or nonbank mortgage lender." R.C. 1345.01(C). Because UWM is a nonbank mortgage lender in a consumer transaction in connection with a residential mortgage, it is a supplier within the meaning of Ohio Admin. Code 109:4-3-10.
- 241. Under R.C. 1345.01(A), "Consumer transaction" includes "transactions in connection with residential mortgages between loan officers, mortgage brokers, or nonbank mortgage lenders and their customers." R.C. 1345.01(A)
- 242. As alleged herein, UWM made representations, claims, and assertions of fact in connection with the promotion and advertising of UWM mortgages and the services of brokers that would cause a reasonable consumer to believe such statements are true, including that brokers originating UWM loans were independent.
- 243. The State seeks a declaratory judgment that UWM has violated Ohio Admin. Code 109:4-3-10, an injunction enjoining UWM's misrepresentations and deceptive conduct described in this Complaint, and civil penalties.

COUNT 3

Violation of CSPA—Unconscionable Acts or Practices Concerning Residential Mortgages, R.C. 1345.031

- 244. The State repeats and realleges the foregoing allegations as though they were fully set forth in this paragraph.
- 245. This Cause of Action is brought in the public interest under the CSPA and seeks a declaratory judgment that UWM has violated the CSPA, an injunction enjoining UWM's misrepresentations described in this Complaint, restitution to Ohio borrowers who were overcharged and damaged by hiring a so-called "independent" broker in connection with purchasing their mortgages from UWM and therefore have been damaged by UWM's conduct, and civil penalties.
- 246. The CSPA makes it unlawful for a "supplier" to commit an unconscionable act or practice in regard to a "consumer transaction" in connection with a residential mortgage:

No supplier shall commit an unconscionable act or practice concerning a consumer transaction in connection with the origination of a residential mortgage. Such an unconscionable act or practice by a supplier violates this section whether it occurs before, during, or after the transaction.

R.C. 1345.031(A).

247. A "supplier" is defined generally as a "seller, lessor, assignor, franchisor, or other person engaged in the business of effecting or soliciting consumer transactions." R.C. 1345.01(C). If the consumer transaction is in connection with a residential mortgage, "supplier" is more specifically defined as "a loan officer, mortgage broker, or nonbank mortgage lender." R.C. 1345.01(C). A "consumer transaction" includes transfers of goods and services generally but excludes transactions between financial institutions and their customers other than "transactions

in connection with residential mortgages between loan officers, mortgage brokers, or nonbank mortgage lenders and their customers." R.C. 1345.01(A).

- 248. R.C. 1345.031(B) further states that "[f]or purposes of division (A) of this section, the following acts or practices of a supplier in connection with such a transaction are unconscionable: . . . (16) Engaging in an act or practice deemed unconscionable by rules adopted by the attorney general pursuant to division (B)(2) of section 1345.05 of the Revised Code."
- 249. In turn, the rules adopted by the attorney general pursuant to R.C. 1345.05(B)(2) include the following prohibition:

109:4-3-10 Substantiation of claims in advertising. It shall be a deceptive act or practice in connection with a consumer transaction for a supplier to: (A) Make any representations, claims, or assertions of fact, whether orally or in writing, which would cause a reasonable consumer to believe such statements are true, unless, at the time such representations, claims, or assertions are made, the supplier possesses or relies upon a reasonable basis in fact such as factual, objective, quantifiable, clinical or scientific data or other competent and reliable evidence which substantiates such representations, claims, or assertions of fact.

109:4-3-10(A).

- 250. Based on the facts alleged in this Complaint, UWM has made representations, claims, and assertions of fact, both orally or in writing, which would cause a reasonable consumer to believe such statements are true, and UWM did not at the time such representations, claims, or assertions were made, possess or rely upon a reasonable basis in fact such as factual, objective, quantifiable, clinical or scientific data or other competent and reliable evidence which substantiates such representations, claims, or assertions of fact, in violation of R.C. 1345.031(B)(16).
- 251. UWM's representations, claims, and assertions of fact include misleading statements through advertising, such as representing that "independent" brokers had characteristics or benefits that they did not have; representing that brokers listed on UWM promotional websites

offered value or functions that they did not deliver; advertising services with the intent that Ohio borrowers would not receive the services advertised; misrepresenting that brokers could independently shop for the best rates from any broker notwithstanding undisclosed contractual agreements between brokers and UWM to (a) boycott UWM's chief competitor(s) and (b) not present to consumer better rates that may be offered by other lenders during UWM's "Lock-In" period; and making misrepresentations and omissions of material facts relating to consumer savings.

- 252. Ohio borrowers suffered ascertainable loss caused by UWM's misrepresentations, false advertising, and failure to disclose material information. As a direct and proximate result of the acts and omissions as set forth herein, Ohio borrowers suffered actual damages in an amount to be determined at trial.
- 253. The State seeks a declaratory judgment that UWM has violated the CSPA, an injunction enjoining UWM's misrepresentations and deceptive practices described in this Complaint, and an order for restitution to Ohio borrowers who were damaged thereby.

COUNT 4

Violation of the Ohio Residential Mortgage Lending Act ("RMLA"), R.C. 1322.01 et seq.

- 254. The State repeats and realleges the foregoing allegations as though they were fully set forth in this paragraph.
- 255. R.C. 1322.52(B)(1) provides that "[t]he attorney general may directly bring an action to enjoin a violation of any provision of this chapter with the same rights, privileges, and powers as those described in section 1345.06 of the Revised Code." R.C. 1322.52(C) further provides that "[t]he remedies provided by this section are in addition to any other remedy provided by law."

- 256. Ohio borrowers are "[b]orrower[s]" within the meaning of R.C. 1322.01. as they engaged in transactions with UWM for "residential mortgage loans" that were (1) primarily for personal, family, or household use and secured by a mortgage, deed of trust, or other equivalent consensual security interest on a dwelling or on residential real estate; and (2) provided and secured by a first lien holder secured creditor or by a subordinate lien holder secured creditor. R.C. 1322.01(II)(1)-(2).
- 257. UWM is a "Registrant" under R.C. 1322.01(HH) by virtue of being "any person that has been issued a certificate of registration under this chapter" and is an entity "that for compensation or gain, or in the expectation of compensation or gain, consummates a residential mortgage loan, advances funds, offers to advance funds, or commits to advancing funds for a borrower[,]" and is therefore a "Mortgage lender" pursuant to R.C. 1322.01(Z).
- 258. Consumers engaged in transactions with UWM for "residential mortgage loans" that were (1) primarily for personal, family, or household use and secured by a mortgage, deed of trust, or other equivalent consensual security interest on a dwelling or on residential real estate; and (2) provided and secured by a first lien holder secured creditor or by a subordinate lien holder secured creditor. R.C. 1322.01(II)(1)-(2).
- 259. R.C. 1322.40 provides that "[n]o registrant, licensee, or person required to be registered or licensed under this chapter, or individual disclosed in an application as required by this chapter, shall do any of the following:...(B) Make false or misleading statements of a material fact, omissions of statements required by state or federal law, or false promises regarding a material fact, through advertising or other means, or engage in a continued course of misrepresentations; (C) Engage in conduct that constitutes improper, fraudulent, or dishonest dealings;...(I) Engage in

any unfair, deceptive, or unconscionable act or practice prohibited under sections 1345.01 to 1345.13 of the Revised Code."

- 260. In violation of R.C. 1322.40(B), UWM made false or misleading statements of material fact as alleged herein.
- 261. In violation of R.C. 1322.40(B), UWM made false promises regarding a material fact, through advertising or other means, as defined by R.C. 1322.01(B). *See* R.C. 1322.01(B) ("Advertising' means a commercial message in any medium that promotes, either directly or indirectly, a residential mortgage lending transaction.").
- 262. In violation of R.C. 1322.40(B), UWM engaged in a continued course of misrepresentations as alleged herein.
- 263. In violation of R.C. 1322.40(C), UWM engaged in conduct that constitutes improper, fraudulent, or dishonest dealings as alleged herein.
- 264. In violation of R.C. 1322.40(I), UWM engaged in unfair acts or practices prohibited under sections R.C. 1345.01 to 1345.13 as alleged herein.
- 265. In violation of R.C. 1322.40(I), UWM engaged in deceptive acts or practices prohibited under sections R.C. 1345.01 to 1345.13 as alleged herein.
- 266. In violation of R.C. 1322.40(I), UWM engaged in unconscionable acts or practices prohibited under sections R.C. 1345.01 to 1345.13 as alleged herein.
- 267. Separately, R.C. 1322.45(A) provides that "[a] registrant, a licensee, and any person required to be registered or licensed under this chapter, in addition to duties imposed by other statutes or common law, shall do all of the following:...(3) Act with reasonable skill, care, and diligence; (4) Act in good faith and with fair dealing in any transaction, practice, or course of business in connection with the brokering or originating of any residential mortgage loan[.]"

- 268. In violation of R.C. 1322.45(A)(3), UWM failed to act with reasonable skill, care, and diligence, as alleged herein.
- 269. In violation of R.C. 1322.45(A)(4), UWM failed to act in good faith and with fair dealing in any transaction, practice, or course of business in connection with the brokering or originating of any residential mortgage loan, to wit, UWM's alleged deceptive steering practices and inducements to brokers.
- 270. R.C. 1322.45(B) provides that the Additional Responsibilities of Registrants under R.C. 1322.45(A)(3)-(4) do not apply to a wholesale lender that has been issued a certificate of registration and "that enters into transactions with buyers exclusively through unaffiliated third-party mortgage brokers." R.C. 1322.45(B). As alleged herein, UWM does not enter into transactions with buyers exclusively through unaffiliated third-party mortgage brokers but instead works with mortgage brokers that UWM has induced to breach fiduciary duties, and with which UWM has conspired to funnel consumers to UWM.
- 271. Violations of the foregoing sections proximately caused injury to Ohio borrowers by causing them to be deceived and economically harmed by their brokers—including by prohibiting brokers from disclosing information to borrowers that UWM knew would have been material to their evaluation of both their loan options as well as their decision to hire brokers who were materially conflicted and not independent.
- 272. While representing that consumers are entitled to rely on "completely independent" brokers to shop for the best price, free from restrictions on their independent judgment, UWM was secretly causing and conspiring with brokers to violate their fiduciary duties and steer business to UWM.

- 273. UWM violated the RMLA by engaging in unfair or deceptive acts, making misleading statements through advertising, and engaging in fraudulent and dishonest dealings, including representing that "independent" brokers had characteristics or benefits that they did not have; representing that brokers listed on UWM promotional websites offered value or functions that they did not deliver; advertising services with the intent that Ohio borrowers would not receive the services advertised; misrepresenting that brokers could independently shop for the best rates from any broker notwithstanding undisclosed contractual agreements between brokers and UWM to (a) boycott UWM's chief competitor(s) and (b) not to present to consumers better rates that may be offered by other lenders during UWM's "Lock-In" period; and making misrepresentations and omissions of material facts relating to consumer savings, all of which constitute false promises and improper or dishonest dealings prohibited by the RMLA.
- 274. Pursuant to R.C. 1322.52(B)(1) and (C), the State seeks to (a) enjoin violations of the RMLA, and (b) any other remedies provided by law.

COUNT 5

Violation of the Ohio Corrupt Practices Act ("CPA"), R.C. 2923.31, et seq.

- 275. The State repeats and realleges the foregoing allegations as though they were fully set forth in this paragraph.
- 276. This claim is brought by the State against UWM for actual damages, treble damages, and equitable relief under R.C. 2923.34 for violations of R.C. 2923.31, *et seq*.
- 277. UWM is a "person" under R.C. 2923.31(G) who conducted the affairs of an enterprise through a pattern of racketeering activity as defined by R.C. 2923.31(E) and (I), in violation of R.C. 2923.32(A)(1).

- 278. The State is a "person," and the Ohio borrowers are "person[s]," that are "injured in his or her business or property" by reason of UWM's violation of the CPA within the meaning of R.C. 2923.31.
- 279. UWM's pattern of corrupt activity from March 2021 to the present directly and proximately caused damage to Ohio's residential homebuyers and customers of UWM, all of whom were harmed by UWM's scheme to deceive them, and to deprive them of information and services they are legally entitled to have and caused them to be subjected to excessive fees and uncompetitive costs.
- 280. By virtue of these violations of CPA, R.C. 2923.31 *et seq.*, UWM is liable to UWM borrowers in this State for three times the damages sustained, which are in excess of \$25,000, plus the cost of this suit, including reasonable attorneys' fees.
- 281. Pursuant to R.C. 2923.34(B), the CPA affords the Court broad powers to "grant relief by entering any appropriate orders to ensure that the violation will not continue or be repeated." R.C. 2923.34(B) also delineates forms of equitable relief that only the Attorney General may seek. The Attorney General seeks the full panoply of relief available under R.C. 2923.34(B), including the equitable forfeiture of ill-gotten gains, received by each defendant (directly or indirectly), to the State in order to ensure that such a scheme will not be repeated.

The CPA Enterprise

- 282. The following persons, and others presently unknown, have been members of and constitute an "association-in-fact enterprise" within the meaning of CPA, R.C. 2921.31(C), and will be referred to herein collectively as the "Steering Enterprise" or "Enterprise."
- 283. <u>UWM</u>, which orchestrated the fraudulent scheme and engaged in a pattern of conduct that involved misrepresenting material facts, causing or conspiring with brokers to

withhold information from home buyers about affordable lenders, offering inducements and things of value to brokers to corrupt their independence and to prevent them from providing honest services.

- 284. <u>UWM officers and executives</u>, including Mathew Ishbia, who collaborated and colluded with each other and with other associates in fact in the Steering Enterprise by disseminating intentionally misleading information to conceal the relationship between UWM and brokers, funding and influencing the affairs of trade associations that published information that facilitated the deceptive scheme, and employing fraudulent tactics to cause Ohio borrowers to purchase UWM loans under false pretenses and without the benefit of disclosures and services that Ohio borrowers were entitled to receive.
- 285. Mortgage brokers and brokerage firms, which breached their fiduciary duties by not acting in Ohio borrowers' best interests, made misrepresentations and material omissions, colluded with UWM to withhold information, accepted things of value from UWM to influence the affairs of the Ohio borrowers and otherwise engaged in the conduct alleged in this complaint.
- 286. Decisions about buying and financing a home are among the most consequential investment decisions most Ohioans make in their lifetimes. Ohio borrowers hired mortgage brokers to provide honest and candid services in this process, and the mortgage brokers were paid for the represented services. The price of a mortgage broker includes the assurance that the broker is acting as a fiduciary and with undivided loyalty toward his or her principal, free from conflict or unauthorized influence from another party.
- 287. Mortgage brokers for Ohio borrowers breached their fiduciary duties by colluding with UWM to withhold information about more affordable loan options, accepting things of value from UWM to influence the affairs of the Ohio borrowers, entering agreements with UWM that

created conflicts of interest and prevented them from providing honest services, and otherwise participating in the Steering Enterprise to deceive Ohio borrowers.

- 288. The Steering Enterprise is an association-in-fact of individuals and corporate entities within the meaning of R.C. 2923.31(C) and consists of "persons" associated together for a common purpose. The Enterprise, which acted within and affected interstate commerce, had an ongoing organization with an ascertainable structure, and it functioned as a continuing unit with separate roles and responsibilities.
- 289. While UWM participated in the conduct of the Steering Enterprise, it had an existence separate and distinct from the Enterprise. Further, the Enterprise was separate and distinct from the pattern of racketeering in which UWM engaged.
- 290. At all relevant times, UWM operated, controlled, or managed the Steering Enterprise, through a variety of actions. UWM's participation in the Enterprise was necessary for the successful operation of its scheme to defraud because UWM sold the mortgages, coordinated with brokers, disseminated false information to conceal the corruption, purchased and maintained valuable advertising platforms that it offered to brokers as inducements, and profited from such concealment.
- 291. The members of the Steering Enterprise all served a common purpose: to sell as many mortgages as possible and thereby maximize the revenue and profitability of the Enterprise's members. The members of the Steering Enterprise shared the bounty generated by the enterprise by, i.e., sharing in the economics derived from increased sales revenue generated by the scheme. Each member of the Steering Enterprise benefited from the common purpose: UWM sold more loans and received more profit than it would have otherwise and gained market share which allowed it to impose restrictions on brokers; Mathew Ishbia and the UWM officers and executives

generated more pecuniary gain for themselves; and the brokers generated more commissions and tangible and intangible value, and were able to obtain valuable advertising and promotion from UWM for their broker services, thereby generating more commissions and business, which, in turn, they funneled to UWM.

Pattern of Corrupt Activity

- 292. UWM conducted and participated in the conduct and affairs of the Steering Enterprise through a pattern of corrupt activity that has lasted years and continues to this day, in violation of R.C. 2923.31(I).
- 293. R.C. 2923.31(I) provides that "corrupt activity" includes both "engaging in" as well as "attempting to engage in, conspiring to engage in, or soliciting, coercing, or intimidating another person to engage in" the underlying racketeering activity. UWM, Mathew Ishbia, and the mortgage brokers (collectively, "Coconspirators") violated R.C. 2923.32 by agreeing and conspiring to engage in racketeering activity.
 - 294. UWM's corrupt activity included numerous and repeated violations of:
 - a. The federal mail and wire fraud statutes, 18 U.S.C. §§ 1341, 1343, and 1346, which prohibit the use of any interstate mail or wire facility for the purpose of executing a scheme or artifice to deprive another of money, property, and/or "the intangible right of honest services" under 18 U.S.C. § 1346, violation of which constitutes racketeering under 18 U.S.C. § 1961(1)(B) and R.C. 2923.31(I)(1);
 - b. The Travel Act, <u>18 U.S.C.</u> § <u>1952</u>, which prohibits "unlawful activity" in interstate commerce, including "bribery...in violation of the laws of the State in which committed," which the U.S. Supreme Court has held includes

commercial bribery. Many states' commercial bribery statutes punish anyone who offers things of value to influence a fiduciary's performance of his or her duties, constituting corrupt activity under R.C. 2923.31(I)(1)-(2).

- 295. For UWM, the purpose of the scheme was to deceive homebuyers about the relationship between UWM and brokers, while preventing homebuyers from being presented with affordable mortgage options from other lenders. By infiltrating and corrupting the fiduciary relationship that existed between homebuyers and their hired agents, UWM was able to charge non-competitive prices, impose over-market closing costs, increase sales, and avoid competition, knowing that the brokers had been influenced to withhold information about available loan options. UWM also maintained and boosted consumer confidence in the UWM brand and the value and independence of brokers by publishing false and deceptive information about UWM brokers and funding organizations to amplify UWM's false information, all of which furthered the scheme to defraud borrowers and helped UWM sell more loans at higher prices than they would have sold otherwise.
- 296. To further the scheme to defraud, UWM repeatedly misrepresented and concealed the relationship between itself and brokers, disseminated false information about the independence of brokers, funded trade associations to amplify UWM's deceptive public messages, offered and provided things of value to induce brokers to funnel business to UWM, conspired and agreed with brokers for them to withhold from their clients material information, and infiltrated the fiduciary relationship between brokers and homebuyers to corrupt their independence, which UWM repeatedly represented was essential to the integrity of the wholesale mortgage market.
- 297. UWM conducted or participated in the affairs of the Steering Enterprise through the following pattern of racketeering activity under R.C. 2923.31(I) that employed the use of the

mail and wire facilities, in violation of <u>18 U.S.C. § 1341</u> (mail fraud), § 1343 (wire fraud), and § 1346 (honest services fraud):

- a. UWM devised and furthered the scheme to defraud by use of the mail, telephone, wires, and internet, and transmitted, or caused to be transmitted, by means of mail and wire communication travelling in interstate commerce, writing(s) and/or signal(s), including the UWM website and websites funded and maintained by UWM, communications with and through brokers, statements to the press, advertisements targeted at consumers, and communications with other members of the Enterprise; and
- b. UWM utilized the interstate mail and wires for the purpose of obtaining money or property, or depriving Ohio borrowers of the intangible right of honest services from their brokers.
- 298. Having devised or intending to devise a scheme to defraud, UWM engaged in or substantially participated in the following acts, among others, using interstate mails or wires in furtherance of the scheme:
 - a. On approximately July 7, 2021, a trade association funded by UWM represented in its publicity materials that Ohio borrowers' brokers were defined by their unrestricted "ability to work with a variety of lenders," which would "allow the brokers to shop for the best price and process for their clients." Ohio borrowers' brokers were restricted from shopping from some of the largest and most affordable wholesale lenders in America. Additionally, brokers were categorically restricted from shopping for better prices from any lenders once Ohio borrowers received

- price quotes from UWM—even though Ohio borrowers were not yet bound to UWM and were entitled to learn about better prices from their brokers.
- b. UWM represented and advertised on its website MortgageMatchup.com under the title "5 Facts about Your Local Mortgage Broker" that Ohio borrowers' brokers would "work[]s on your behalf" to "present the best loan options available," which UWM knew to be materially false, including because (a) UWM actively took measures to prevent Ohio borrowers from being presented with multiple loan options; and (b) UWM had access to information demonstrating to a degree of statistical certainty that UWM had successfully induced brokers to regularly withhold the best loan options available, because, for example, UWM brokers frequently referred upwards of 95% or even 99% of their business to UWM even though UWM only offered the best overall prices a small percentage of the time.
- c. UWM's website advertisements deceptively implied that Ohio borrowers' brokers were the opposite of "the type of shopper who always buys at the first store" and would instead "shop loans...on your behalf to find you the best rate." This was materially false, as UWM took measures to restrict Ohio borrowers' ability to obtain the best rates and knew their brokers were not shopping on behalf of their clients.
- d. UWM enabled, instructed, encouraged, and incentivized Ohio borrowers' brokers and others to use marketing tools that were designed and/or approved by UWM's in-house marketing team for the purpose of standardizing and coordinating the promotional appeals that brokers make to prospective borrowers, including Ohio borrowers. These tools, including website templates and UWM's "Brand Builder"

platform, embed UWM's preferred marketing messages, emphasizing, among other things, brokers' "independence," creating a false and misleading impression, through affirmative misrepresentations and omissions, that the particular broker or loan officer has no allegiance to any single lender and instead shops around to numerous lenders to find borrowers the most competitive, affordable, and/or suitable deals. UWM further designs these marketing materials to conceal its own involvement in creating them and instructs brokers that "there is nothing UWM" on them, and that they should "not change" any of the verbiage in the templates.

- e. On February 15, 2019, UWM's CEO publicly represented in the media that "Mortgage brokers are completely independent. They are not captive or connected to my company or any company. They are independently shopping...." On information and belief, the substance of UWM's marketing and advertisements has been materially consistent with this statement during the relevant time period.
- f. On March 13, 2019, UWM's CEO stated, "brokers have access to all lenders" and access to all unique products offered by lenders. On information and belief, UWM disseminated this representation on other occasions.
- g. On December 4, 2020, UWM's CEO publicly represented the brokers listed on FindaMortgageBroker.com would shop for "cheaper" mortgages and present whichever has the "lower rate," even though the undisclosed purpose and effect of the website was, in fact, to funnel customers to brokers who UWM knew were least likely to shop for the lowest rate on behalf of their clients. On information and belief, UWM repeated this representation, in substance, multiple times during the relevant time period.

- h. UWM published and maintained its FindaMortgageBroker.com and/or MortgageMatchup.com websites that published false and misleading advertisements and information about the relationship between UWM and brokers, as well as about the brokers' purported duty to shop for the best prices on behalf of Ohio borrowers. These advertisements were intentionally deceptive.
- i. UWM transmitted through interstate mail or wires its Wholesale Broker Agreement, which contained provisions that, in substance, required brokers to perpetrate honest services fraud on Ohio borrowers and make fraudulent omissions of material fact. Those Agreements imposed penalties on brokers who recommended loan options from UWM's competitors (even when such competitors offered substantially lower prices or costs for mortgage services), and did not permit brokers to present any loan options to Ohio borrowers after they had received a price quote from UWM (even though Ohio borrowers themselves never agreed to such a condition and were legally entitled to price shop). As a result of this, UWM participated in the brokers' breaches of fiduciary duty, deprived consumers the benefit of honest services, and caused them to pay for mortgages or mortgage-related services under false pretenses and with incomplete disclosures.
- j. UWM caused and conspired with Ohio borrowers' brokers to deceive Ohio borrowers into believing the brokers were independent brokers who were acting on Ohio borrowers' behalf to search multiple loan offerings for the most competitively priced loans, and caused the brokers to deceive Ohio borrowers by, among other things, prohibiting the brokers from disclosing material facts about the true nature of their relationship with UWM and their pledge not to originate loans with UWM's

main competitor. UWM engaged in these acts with the specific intent to defraud Ohio borrowers so that UWM would increase their profits and market share by obtaining business they would not otherwise have obtained but for the scheme to defraud.

k. Prior to and on all the dates Ohio borrowers hired their brokers and closed their loans as alleged above, UWM caused and conspired with Ohio borrowers' brokers to systematically conceal material information from Ohio borrowers to ensure that they would be uniformly and materially underinformed or misinformed when they reached the closing table. Among other things, UWM caused and conspired with Ohio borrowers' brokers to conceal and fail to disclose: (i) the fact that those brokers are bound, under UWM's Wholesale Broker Agreement, to not shop for or present loans from Rocket Mortgage or Fairway Independent Mortgage; (ii) the fact that those brokers are bound, under UWM's Wholesale Broker Agreement, to not shop for or present loan options from any other lender once the borrower's interest rate has been locked; (iii) the fact that those brokers face penalties and/or legal exposure for violating any terms in UWM's Wholesale Broker Agreement that restrict their ability to independently shop; (iv) the fact that, in exchange for originating a larger proportion of their loans with UWM, those brokers are eligible to receive valuable perks and benefits from UWM, including meals, trips, gifts, apparel, entertainment, awards, referrals, access to preferential loan products and discounts, and/or access to preferential placement on UWM's broker search engine; (v) the fact that those brokers use marketing materials that were produced, created, or otherwise reviewed and approved by UWM; (vi) the fact that UWM's loans are

often more expensive than substantially similar alternatives from other lenders in the wholesale market; (vii) the fact that, as a result of UWM's system of contractual restrictions and incentives, Ohio borrowers' brokers have conflicts of interest that can impact their performance of services on behalf of their clients; (viii) the fact that those brokers are not independently shopping for loans in the borrower's best interest; and/or (ix) the fact that those brokers originate the vast majority, or in some cases virtually all, of their loans with UWM.

- 299. UWM's conduct in furtherance of this scheme was intentional. The State and Ohio borrowers were directly and indirectly harmed as a result of UWM's conduct.
- 300. As described throughout this Complaint, UWM engaged in a pattern of related and continuous predicate acts for years. The predicate acts constituted a variety of unlawful activities, conducted with the common purpose of obtaining from Ohio borrowers' revenue and market share that UWM otherwise would not have received. The common purpose involved avoiding competition from lenders who offered more affordable loans and closing costs, by propagating material misrepresentations and omissions, and infiltrating the fiduciary relationship between homebuyers and brokers. The predicate acts had the same or similar results, participants, victims, and methods of commission. The predicate acts were committed or caused to be committed by UWM through their participation in the Steering Enterprise and in furtherance of its fraudulent scheme. The predicate acts were interrelated and not isolated events. The predicate acts of fraud or attempt to defraud were committed each time UWM published or transmitted false information about the independence of brokers (as alleged above in this Complaint); each time conspiring brokers published or transmitted false information about the nature of the services provided or their relationship with UWM in furtherance of the scheme, each time UWM's website

FindAMortgageBroker.com generated search results for "independent" brokers who were, in fact, beholden to UWM and obtained their placement in the search results by, among other things, funneling loans to UWM and agreeing with UWM not to refer any business to UWM's largest competitors; each time UWM transmitted the Wholesale Broker Agreement to brokers in furtherance of the scheme to defraud; each time UWM offered things of value to brokers to influence them to refer business to UWM; each time UWM and brokers concealed and failed to disclose the material facts surrounding the true nature of the relationship between UWM and those brokers, among other times.

- 301. By reason and as a result of the conduct of UWM's substantial participation in the steering scheme in violation of R.C. 2923.31 and R.C. 2923.32(A), Ohio borrowers were injured in their business and/or property in multiple ways, including paying the prices, rates, closing costs, commissions, and fees that Ohio borrowers paid, directly or indirectly, to UWM and brokers. Alternatively, Ohio borrowers suffered the economic harms of overpaying for mortgages and for broker services, including excess prices, rates, closing costs, commissions, and fees that Ohio borrowers paid, directly or indirectly, to UWM and brokers.
- 302. Ohio borrowers were also injured in their business and/or property and suffered the economic harms associated with being deprived of their rights to:
 - a. Hire a loyal, honest, and non-conflicted broker;
 - b. Receive complete and candid disclosures and information;
 - c. Not be exposed to materially deceptive and false advertising;
 - d. Obtain a mortgage with the lowest costs, fees, or pricing;
 - e. Obtain a mortgage from a restricted lender;
 - f. Make an informed decision based on complete information; and

- g. Receive the services that they paid for.
- 303. As a result of the corrupt activity, including the conspiracy to engage in the underlying racketeering activity alleged herein, Ohio borrowers suffered economic injury by paying prices, rates, closing costs, commissions, and fees they would not have otherwise paid, and for services they did not receive.
- 304. There are no intermediate causes, nor any difficulty determining which damages can be attributed to UWM's misconduct. UWM has engaged in a scheme to defraud that involved making and causing to be made material misstatements or omissions, and making inducements in violation of state bribery laws, with the specific intent to obtain money from Ohio borrowers that UWM otherwise would not have obtained. Ohio borrowers were direct targets and victims of UWM's scheme.
- 305. UWM's actions alleged herein were reasonably calculated to deceive persons of ordinary prudence and comprehension, and they were committed with reckless indifference to the truth, if not the outright intent to deceive.
- 306. The violations of R.C. 2923.31 were committed with the specific intent to defraud, thereby entitling the victimized citizens of the State to treble damages under R.C. 2923.34, as well as injunctive/equitable relief and costs and reasonable attorneys' fees.
- 307. In addition, the Court is granted broad authority to grant an injunction to stop and rectify corrupt enterprises under R.C. 2923.34. Under R.C. 2923.34(B), this Court may "grant relief by entering any appropriate orders to ensure that the violation will not continue or be repeated" and "may grant injunctive relief without a showing of special or irreparable injury." R.C. 2923.34(D). An injunction should issue because of "the possibility that any judgment for money damages might be difficult to execute."

308. Pursuant to R.C. 2923.34(B)(2), UWM, along with its predecessors, parents, associates, subsidiaries, successors and assigns should be enjoined from receiving any monetary benefit generated through its pattern of racketeering activity and the funneling scheme and, "in the attorney general's opinion, the proceeding is of general public interest." R.C. 2923.34(C). This action is in the general public interest because, *inter alia*, it involves a multibillion-dollar corporation and leading lender in Ohio conspiring to use illegal means to undermine the integrity of the wholesale residential mortgage market and defraud Ohioans in relation to one of the most consequential financial decisions they will ever make—buying a home—for the sake of increasing profits.

COUNT 6

Civil Conspiracy

- 309. The State repeats and realleges the foregoing allegations as though they were fully set forth in this paragraph.
- 310. A fiduciary relationship existed between Ohio borrowers and their mortgage brokers.
- 311. Ohio borrowers' mortgage brokers established a special relationship with Ohio borrowers whereby the brokers caused Ohio borrowers to repose confidence and trust in them by, *inter alia*, participating in the steering scheme, holding themselves out as "independent" mortgage brokers, and causing Ohio borrowers to believe, through their affirmative misrepresentations and omissions, that they would act without allegiance to any particular lender and undertake a responsibility to provide unconflicted, good faith advice to Ohio borrowers and to find the most affordable and/or most suitable deals on Ohio borrowers' behalf.

- 312. Mortgage brokers, including Ohio borrowers' mortgage brokers, have knowledge and expertise superior to the average borrower such that borrowers are in an unequal bargaining position as to their broker and brokers can exercise overmastering or dominant influence over borrowers.
- 313. Ohio borrowers' mortgage brokers exercised such overmastering or dominant influence over Ohio borrowers when wrongfully recommending and executing the loans at issue.
- 314. The Ohio borrowers' mortgage brokers owed fiduciary duties to Ohio borrowers and were only permitted to act in the best interests of Ohio borrowers.
- Ohio borrowers' mortgage brokers breached their fiduciary duties by not acting in Ohio borrowers' best interests, demonstrating divided loyalties, failing to disclose material facts and conflicts of interest, colluding with UWM to withhold information about affordable loan options, accepting things of value from UWM to influence the affairs of the Ohio borrowers, entering agreements with UWM that created conflicts of interest and prevented brokers from providing honest services, and otherwise participating in the scheme alleged in this complaint.
- 316. The brokers consented to and benefitted from being deceptively advertised by UWM as having characteristics they did not possess and/or as performing services they could not perform in good faith as advertised. These advertisements were designed to influence reasonable homebuyers based on false or misleading premises.
- 317. UWM entered into one or more express or implied agreements with mortgage brokers with the purpose of breaching fiduciary duties owed to Ohio borrowers.
- 318. UWM engaged in unlawful acts with mortgage brokers in furtherance of the conspiracy, including publishing false and deceptive advertising, colluding to deprive Ohio borrowers of honest services, entering agreements to prevent Ohio borrowers from being informed

about more affordable loan options from UWM's competitors, providing things of value to influence brokers to steer business to UWM, causing brokers to make fraudulent omissions or misrepresentations, and otherwise engaging in the conduct alleged in this complaint.

- 319. This conspiracy substantially assisted or encouraged the wrongdoing conducted by the mortgage brokers; further, UWM had knowledge of this wrongdoing, and UWM's actions taken in furtherance of the conspiracy were committed pursuant to a common scheme.
- 320. As a direct and proximate result of UWM's actions and participation in the conspiracy, Ohio borrowers were damaged in an amount to be proven at trial. Because UWM's acts were malicious, willful, and wanton, Ohio borrowers are entitled to punitive damages.

COUNT 7

Unjust Enrichment

- 321. The State repeats and realleges the foregoing allegations as though they were fully set forth in this paragraph.
- 322. Ohio borrowers have conferred direct benefits on and enriched UWM in the form of significant payments for closing costs, interest, and other fees in relation to the mortgage loans UWM sold to them as a result of UWM's illicit steering scheme.
- 323. The benefits that Ohio borrowers conferred to UWM were conferred neither officiously nor gratuitously.
- 324. Ohio borrowers experienced an impoverishment, detriment, and loss by conferring more money to UWM for a mortgage loan than Ohio borrowers otherwise would have paid for a comparable wholesale mortgage loan but for UWM's illicit steering scheme.
- 325. UWM's benefit is directly related and connected to Ohio borrowers' loss because Ohio borrowers would not have experienced their loss apart from conferring upon UWM the

significant payments for closing costs, interest, and other fees as a result of UWM's illicit steering scheme.

- 326. UWM appreciates and has knowledge of the conferred benefits vis-à-vis the hundreds of millions of dollars reaped through its scheme.
- 327. UWM voluntarily and consciously accepted and retained the benefits conferred by Ohio borrowers.
 - 328. Ohio borrowers reasonably expected their brokers to operate independent of UWM.
- 329. Because UWM devoted substantial marketing efforts to convey the falsity that brokers who work with them are independent, UWM appreciated and had knowledge of Ohio borrowers' reasonable expectations that their brokers operated independently from UWM and were therefore providing the most competitive wholesale mortgage loan offers to Ohio borrowers.
 - 330. UWM acted with conscious disregard of the rights of Ohio borrowers.
- 331. If Ohio borrowers' other claims herein should fail, Ohio borrowers have no adequate remedy at law and equitable relief is necessary.
- 332. No express contract, including Ohio borrowers' mortgage loan agreements with UWM, covers the subject matter of UWM's inequitable acceptance and retention of Ohio borrowers' money as a result of UWM's illicit steering scheme.
- 333. No express contract, including Ohio borrowers' mortgage loan agreements with UWM, provides a remedy for UWM's inequitable acceptance and retention of Ohio borrowers' money as a result of UWM's illicit steering scheme.
- 334. It is inequitable for UWM to retain the conferred benefits from Ohio borrowers without restitution because UWM engaged in unconscionable conduct; namely, UWM induced the conferred benefits through deception and a steering scheme that would have been impossible but

for UWM's intentional infiltration and corruption of the fiduciary relationships between brokers and homebuyers who were making one of the most consequential financial decisions of their lives.

- 335. UWM received money and value from their promotion and sale of mortgage loans that are traceable to the conduct alleged herein; these benefits have been improperly retained and in good conscience should be returned to Ohio borrowers.
- 336. In addition, UWM parlayed hundreds of millions of dollars in gains from unscrupulously selling mortgages into dominant market share in the wholesale mortgage channel, with an economic value to be determined at trial, and for which disgorgement should be ordered.
- 337. The financial benefits derived by UWM rightfully belong to Ohio borrowers. The Court should compel UWM to disgorge all inequitable proceeds received by them in a common fund for the benefit of Ohio borrowers. A constructive trust should be imposed upon all wrongful or inequitable sums received by UWM.

COUNT 8

Fraud

- 338. The State repeats and realleges the foregoing allegations as though they were fully set forth in this paragraph.
- 339. As alleged herein, UWM engaged in false representations and fraudulent concealments of material fact regarding the independence of wholesale mortgage brokers and the quality of the rates and fees charged in connection with mortgages offered by UWM.
- 340. UWM disseminated deceptive statements through a carefully crafted marketing scheme, whereby UWM provided false marketing materials to corrupted brokers for dissemination to the public in order to both (a) influence prospective Ohio borrowers into purchasing over-priced

mortgages; and (b) prevent borrowers from being advised of more affordable loan options from UWM's main competitors.

- 341. UWM's false factual representations and concealments were reasonably calculated to deceive Ohio borrowers, were made with the intent to deceive, and did in fact deceive thousands of Ohio borrowers who purchased overpriced mortgages from UWM through corrupted brokers.
- 342. Ohio borrowers who purchased mortgages from UWM through corrupted brokers reasonably relied on UWM's false representations and concealments of material fact.
- 343. As a direct and proximate cause of UWM's fraudulent conduct, Ohio borrowers have been injured.

PRAYER FOR RELIEF

WHEREFORE, the State, respectfully prays that this Court:

- A. Adjudge and decree that UWM has engaged in acts or practices in violation of the CSPA, R.C. 1345.01 *et seq.* and its Substantive Rules, Ohio Admin. Code 109:4-3-01 *et seq.*, as previously set forth;
- B. Permanently enjoin and restrain UWM from engaging in unfair or deceptive consumer sales practices set forth herein and from violating the CSPA, R.C. 1345.01 *et seq.* and its Substantive Rules, Ohio Admin. Code 109:4-3-01 *et seq.*;
- C. Assess, fine and impose upon UWM a civil penalty pursuant to R.C. 1345.07(D) of Twenty-Five Thousand Dollars (\$25,000.00) for each unfair or deceptive act or practice "declared to be unfair, deceptive, or unconscionable by rule adopted pursuant to division (B)(2) of section 1345.05 of the Revised Code before the consumer transaction on which the action is based occurred or an act or practice that was determined by a court of this state

- to violate section 1345.02, 1345.03, or 1345.031 of the Revised Code and committed after the decision containing the court's determination was made available for public inspection[.]" R.C. 1345.07(D);
- D. Pursuant to R.C. 1322.52(B), permanently enjoin and restrain UWM from engaging in unscrupulous consumer sales practices in connection with residential mortgages in violation of R.C. 1322.01 *et seq.* as alleged herein;
- E. Issue orders that the acts alleged herein be adjudged and decreed to be unlawful in violation of R.C. 2923.31 *et seq.* and enter a judgment declaring them to be so;
- F. Order UWM to pay compensatory, treble damages, and/or disgorgement/restitution as a result of engaging in, or conspiring to engage in, a pattern of corrupt activity in violation of CPA.
- G. Order that the State recover all measures of damages allowable under the common law identified herein, including (1) compensatory damages and costs for economic loss; (2) restitution and disgorgement; (3) reimbursement or restitution of the amounts Ohio borrowers paid mortgage brokers who funneled them to UWM; and (4) equitable and injunctive relief, as permitted by law or equity;
- H. Order that the State recover the costs and expenses of suit, pre- and post-judgment interest, and reasonable attorneys' fees as provided by law;
- Order that the Court order such other and further relief as the Court deems just, necessary, and appropriate.

JURY DEMAND ENDORSEMENT

Plaintiff, the State of Ohio, by and through its Attorney General, Dave Yost, demands a trial by jury on all claims to the maximum number of jurors permitted by law.

Dated: April 16, 2025 Columbus, Ohio

Respectfully submitted,

By: /s/ Eric Palmer

OFFICE OF THE ATTORNEY GENERAL OF THE STATE OF OHIO

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All out-of-state counsel to be admitted *pro hac vice*.

Counsel for Plaintiff, State of Ohio

Appendix A

UMC Capital: Empowering Your Dreams with Trust and Expertise

Welcome to UMC Capital, a leading mortgage company renowned for its commitment to helping clients achieve their homeownership and investment dreams. With our roots deeply embedded in Cincinnati, Ohio, we are proud to extend our services across Cleveland and Northern Kentucky. As a regional powerhouse, UMC Capital is fully licensed in Ohio, Kentucky, Tennessee, and Florida, ensuring a broad reach and deep understanding of the diverse real estate markets in these areas.

Our specialization lies in both residential and commercial lending, where we distinguish ourselves through exceptionally low rates and minimal closing costs. At UMC Capital, we understand that every client's financial situation is unique. That's why we offer tailored lending solutions designed to meet individual needs, whether you're buying your first home, refinancing, or investing in commercial real estate. Our expertise in navigating complex financial landscapes ensures a smooth and hassle-free lending process for our clients.

As the top brokerage in Ohio, UMC Capital prides itself on housing some of the best loan officers in the region. Our team's unparalleled local knowledge, combined with a steadfast commitment to client satisfaction, has cemented our reputation as a trusted partner in the lending industry. We are not just about closing deals; we are about building lasting relationships and ensuring that your journey with us is as rewarding as achieving your property goals. Partner with UMC Capital and experience a lending process defined by excellence, integrity, and unwavering support every step of the way.

https://www.umcincy.com/

About Us

Our mission is to serve our customers with honesty, integrity and competence. Our goal is to provide home loans to our clients while providing them with the lowest interest rates and closing costs possible. Furthermore, we pledge to help borrowers overcome roadblocks that can arise while securing a loan.

https://www.umcincy.com/about-us

A mortgage professional for over 25 years, Ben Gennarelli has dedicated himself to exceptional customer service. Using a handson approach, strong product knowledge and solution based thinking; he has helped borrowers achieve the ultimate goal of
purchasing, building and remodeling their dream home while also offering creative refinancing solutions. His expertise includes an
extensive background in FHA, VA, Conventional and Portfolio products which help to create a wide variety of choices to meet and
exceed each customer's unique mortgage need. Ben is all about family and that is how he approaches his profession. Family
requires trust as the foundation, commitment and communication to build a strong report and respect and appreciation to foster
deep ties. All of these qualities help to create strong relationships that last a lifetime. Ben is a proud Poppa of 3 boys, Nikolas,
Anthony and Lukas, and currently resides in Willoughby. An Ohio resident his entire life, he graduated from Benedictine High
School and The Ohio State University.



https://www.mottomortgage.com/offices/neo-shaker-heights/ben-gennarelli



https://www.mottomortgage.com/offices/unlimited-tiffin/



Why Motto Mortgage?

You want local mortgage loan shopping. And that's just what we offer... but better. How, you ask? When you work with Motto, you get a neighborhood mortgage professional at a locally-owned office — plus the power of a national network.





Real people who really care.

The standard mortgage experience can be impersonal. Good thing we're not your grandma's stuffy mortgage company (or your college roommate's online lending giant). The mortgage professionals in your local Motto office have more time to advocate for you, answer all your questions, and be there for every step of the process — and beyond. Why? Because our national support team takes care of those mundane little tasks that usually take up other mortgage professionals' time. And most importantly, our home loan shoppers just really care.

Next >

https://www.mottomortgage.com/offices/unlimited-tiffin/

But wait. There's more to Motto Mortgage.

Sure, our super competitive interest rates, stellar customer service, and easier application process are our hallmarks. But we have a few other tricks up our sleeve.

Many Motto offices are **one-stop-home-shops**. That's because they offer both real estate agents and mortgage professionals under one roof. Yup! You can talk house hunting and home loans in one place. And the best part? Your agent and mortgage pro will work so closely together that you might not even realize where one ends and the other begins — and that's a beautiful thing. Already have a real estate agent? Our mortgage professionals love working with new people too.

Oh, and we're also philanthropic. Remember that "local heart" we talked about? It's something we take seriously and it's why we started the Motto Mortgage Mission Against Hunger. Our network offices work to gather food and monetary donations for their neighborhood food banks and pantries... because community needs go far beyond housing.

https://www.mottomortgage.com/offices/unlimited-tiffin/



https://summithomelending.com/team-member/greg-curran/

As a lending specialist dating back to 2004, I believe that helping educate borrowers on their options and finding the right loan for them, is the best way to approach this profession. Each borrower, each family's needs and goals are not the same. I will customize financial solutions tailored to each borrower's ability and goals. Every borrower will be treated with the utmost respect and made sure they understand the whole process from beginning to end. Every borrower will be left realizing they've received the best service out there.

About Summit Home Lending

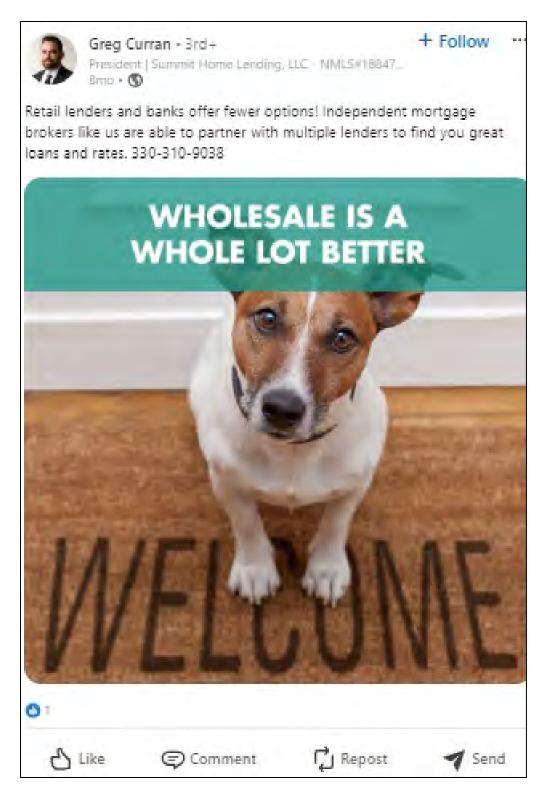
As lending specialists dating back to 2004, we believe that helping educate borrowers on their options and finding the right loan for them is the best way to approach this profession. Each borrower, each family's needs and goals are not the same. We will customize financial solutions tailored to each borrower's ability and goals. Every borrower will be treated with the utmost respect and made sure they understand the whole process from beginning to end. Every borrower will be left realizing they've received the best service out there.

MISSION: Help consumers get access to the best mortgage, with transparency and professionalism.

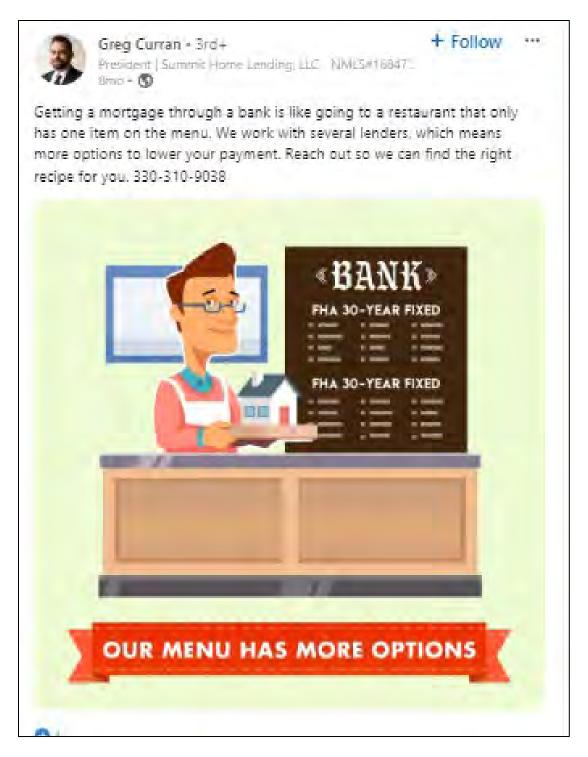
VISION: Educate and serve all mortgage consumers in Ohio while preserving the true wholesale to broker model, ensuring the most competitive mortgage for the consumer.

ACTION: Deliver lower mortgage costs and a faster origination experience by working for YOU rather than the lenders, using a transparent and systematic approach to making lenders compete for YOUR business.

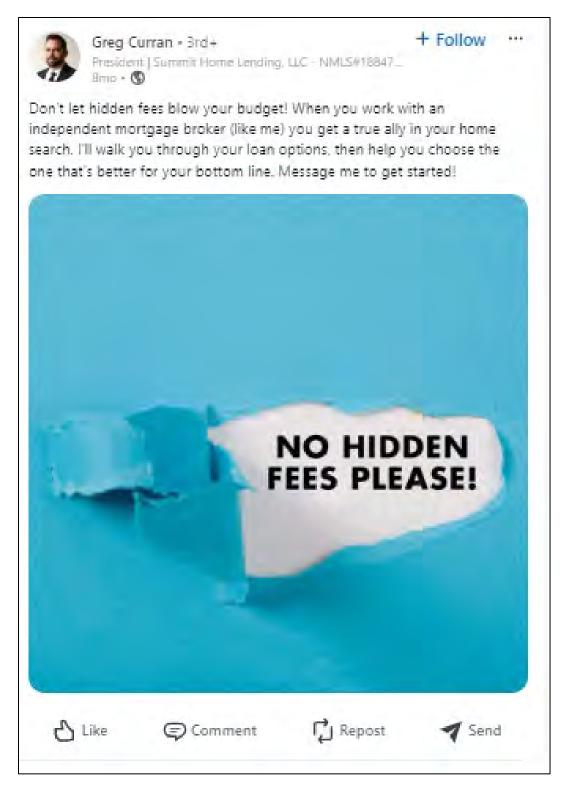
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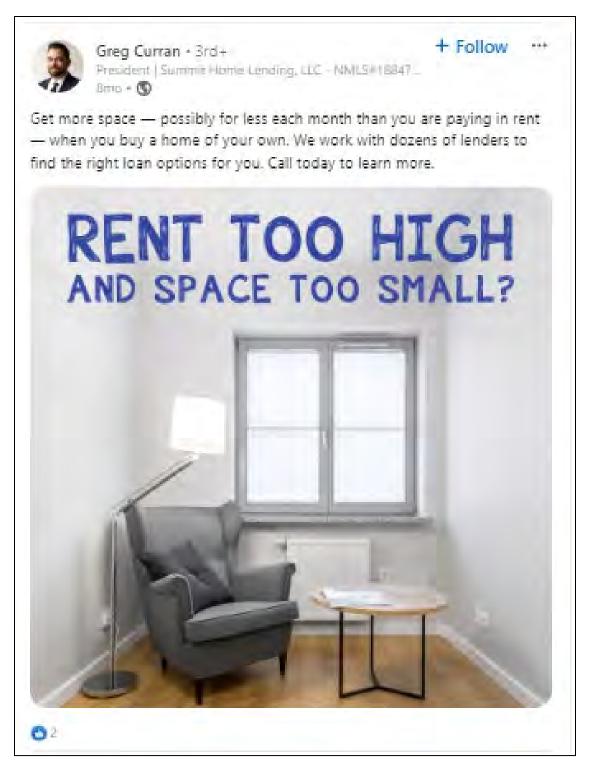
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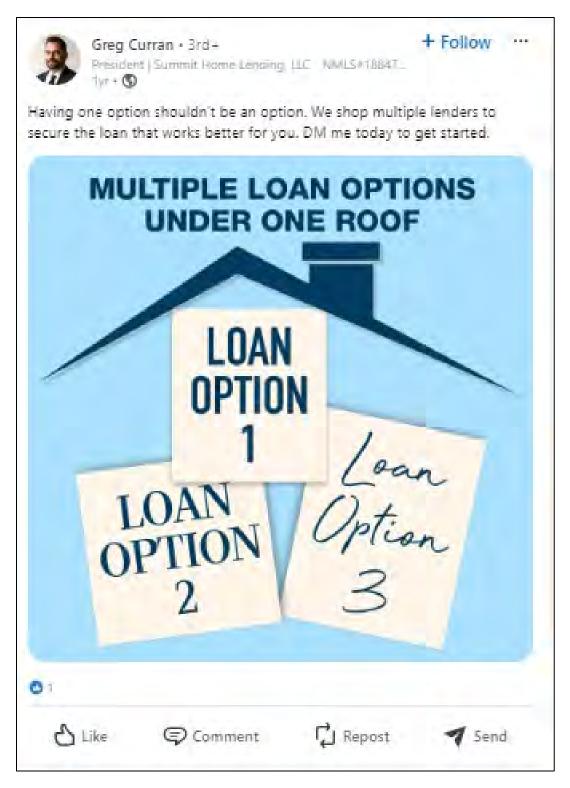
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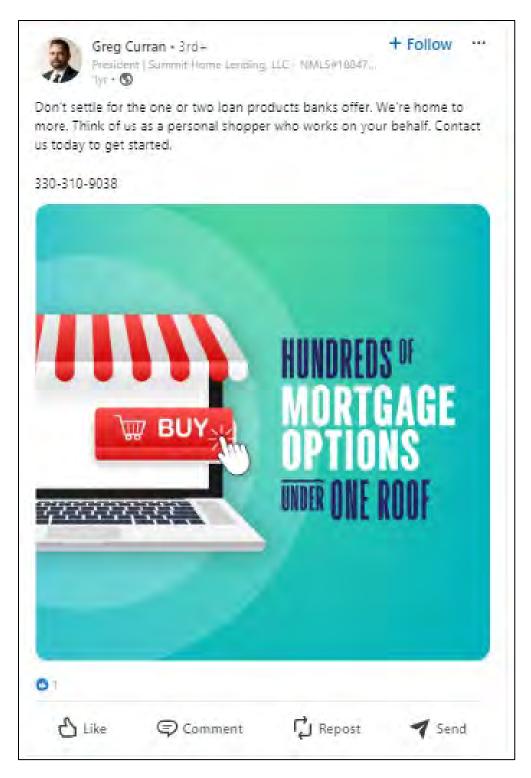
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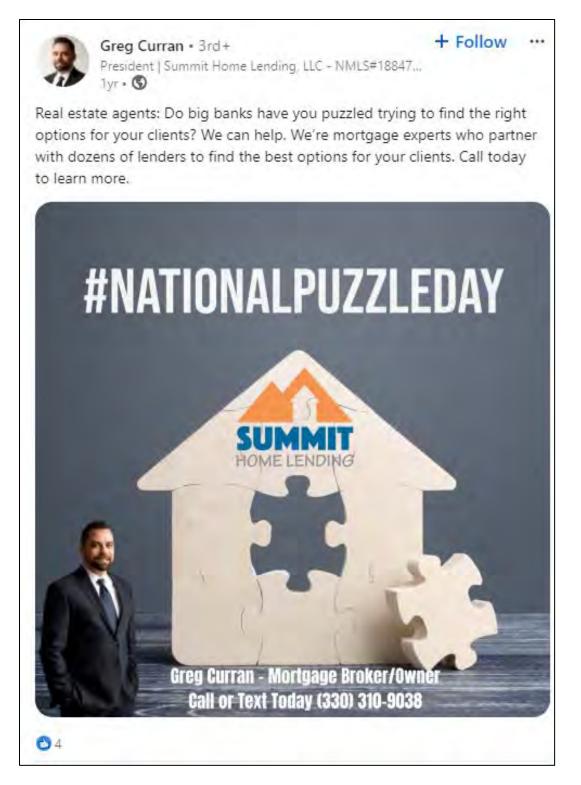
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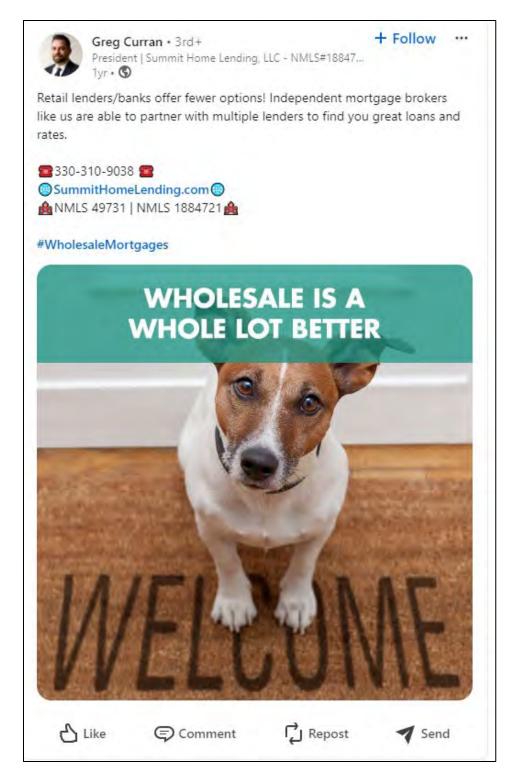


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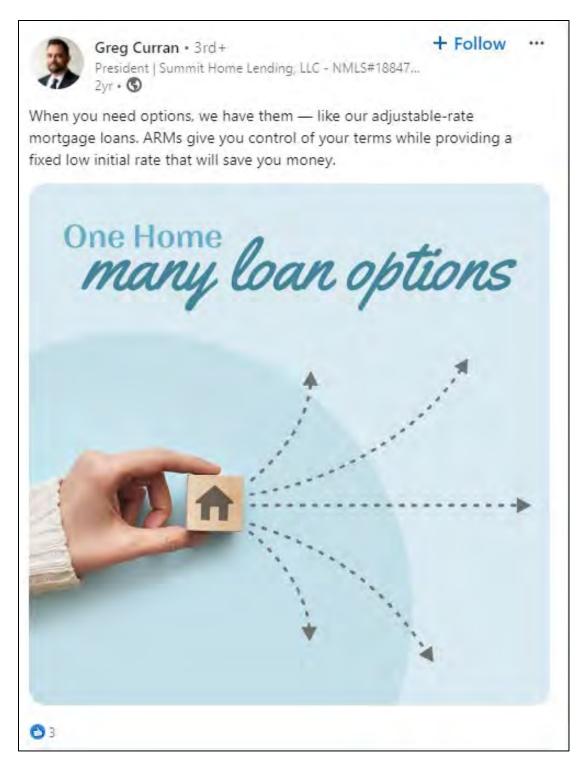
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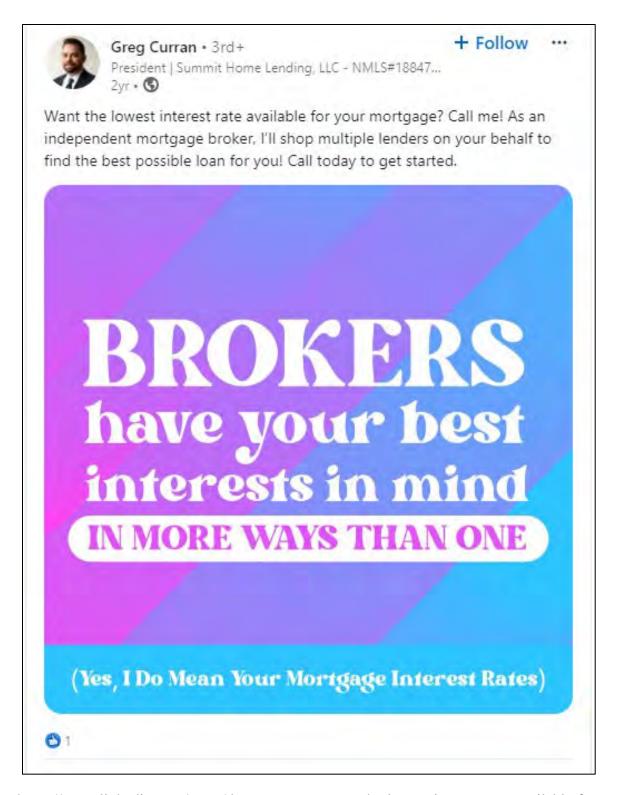
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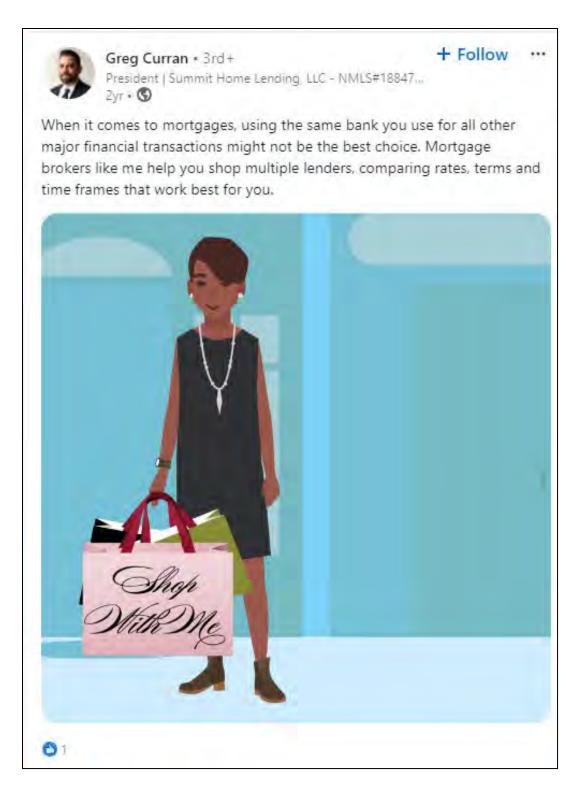
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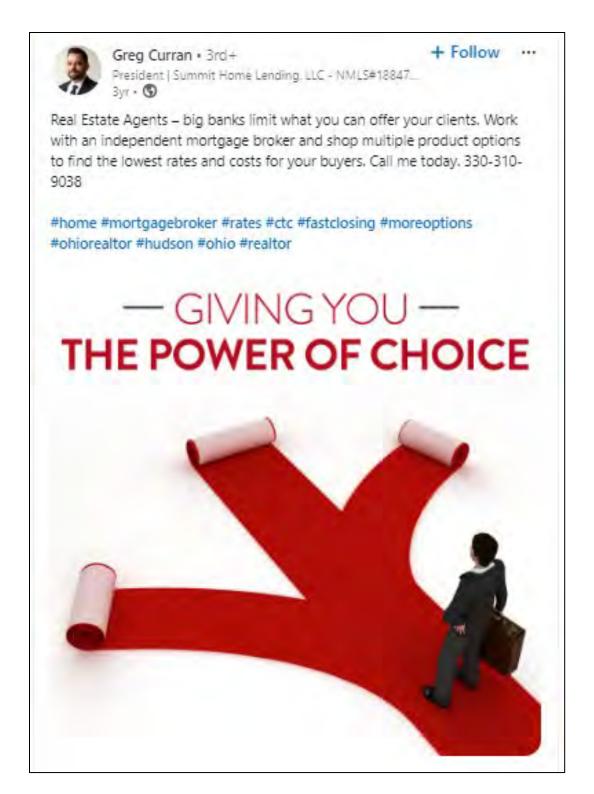
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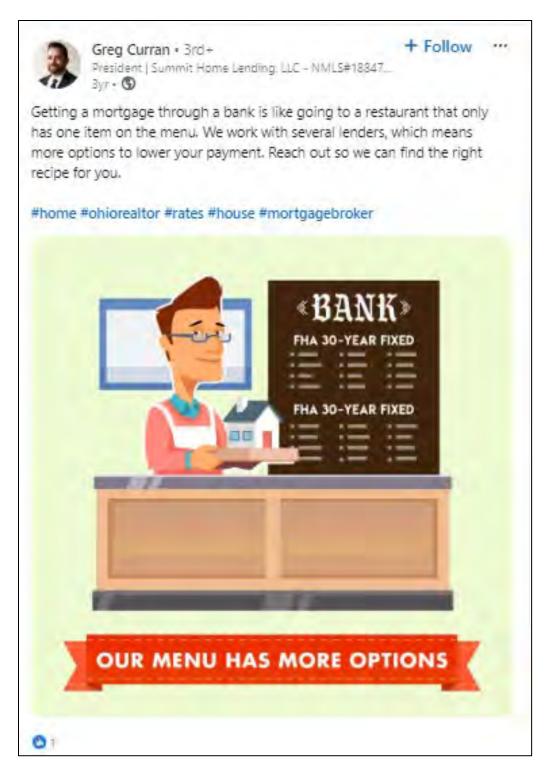
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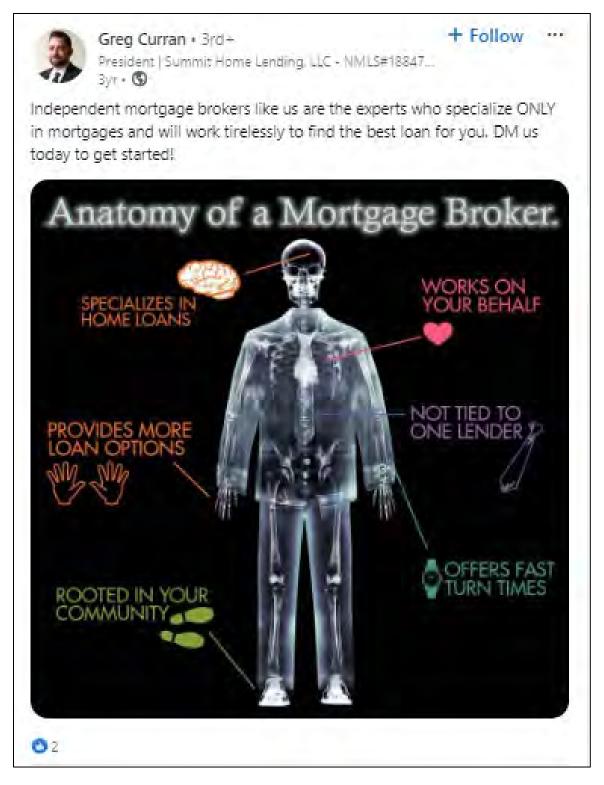
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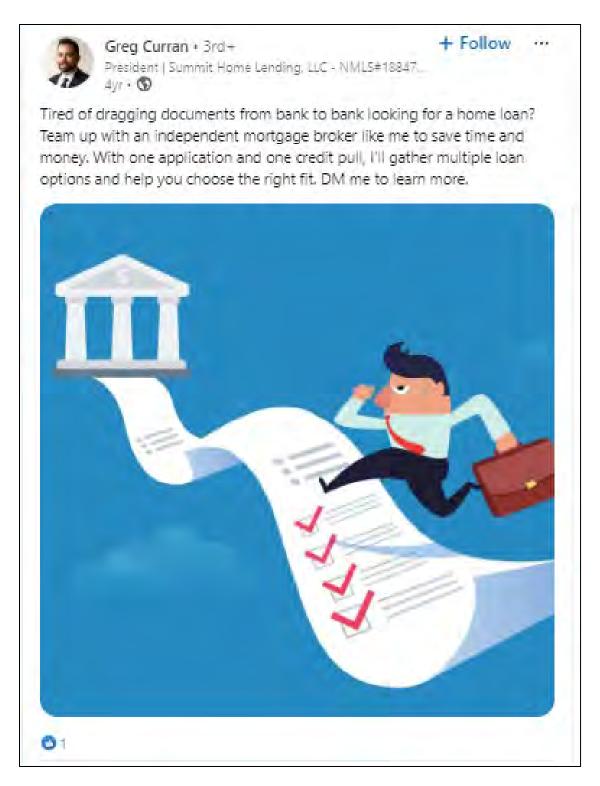
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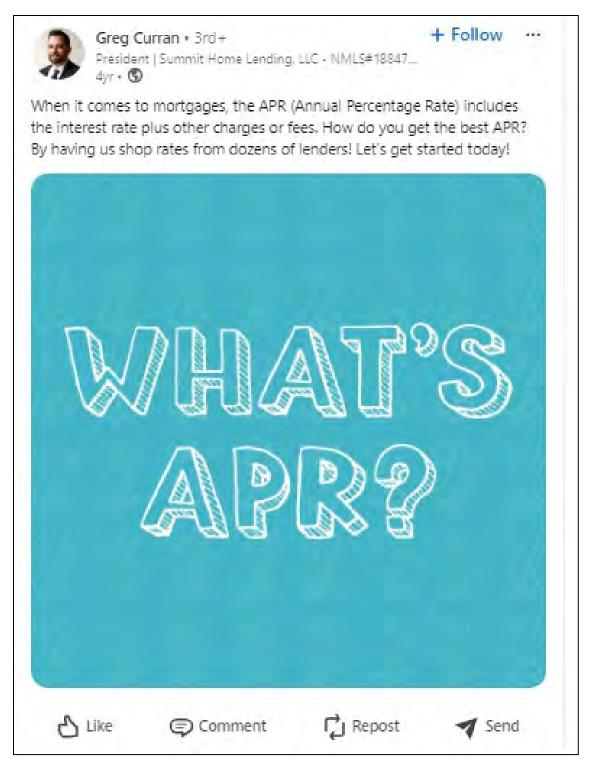
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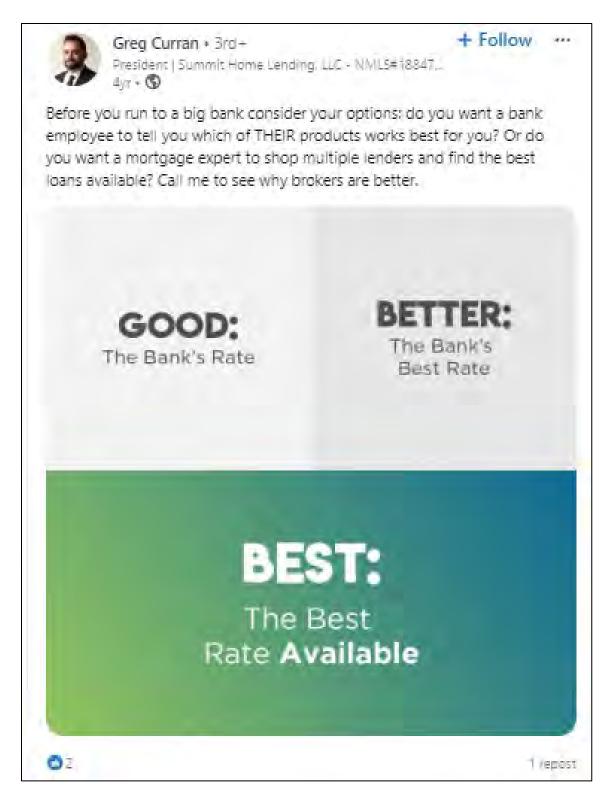
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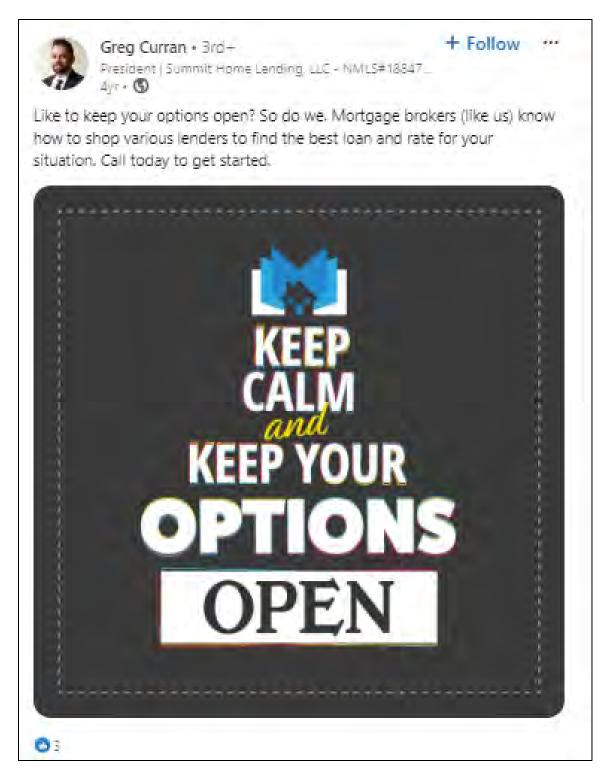
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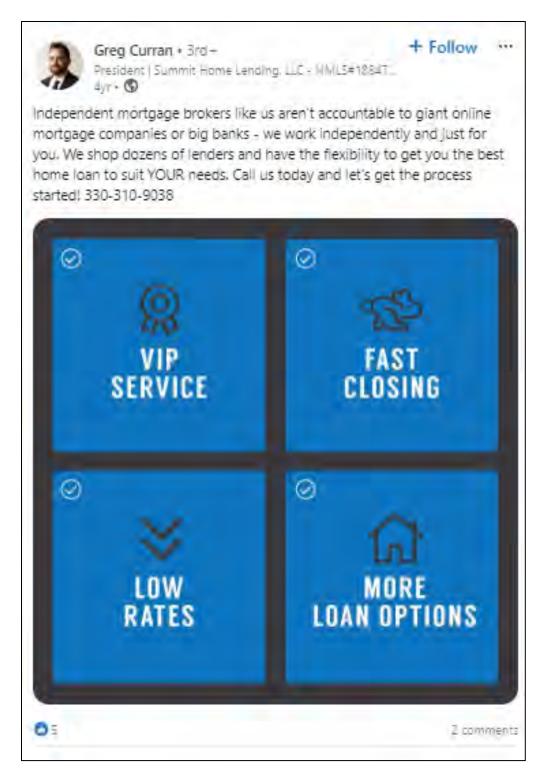
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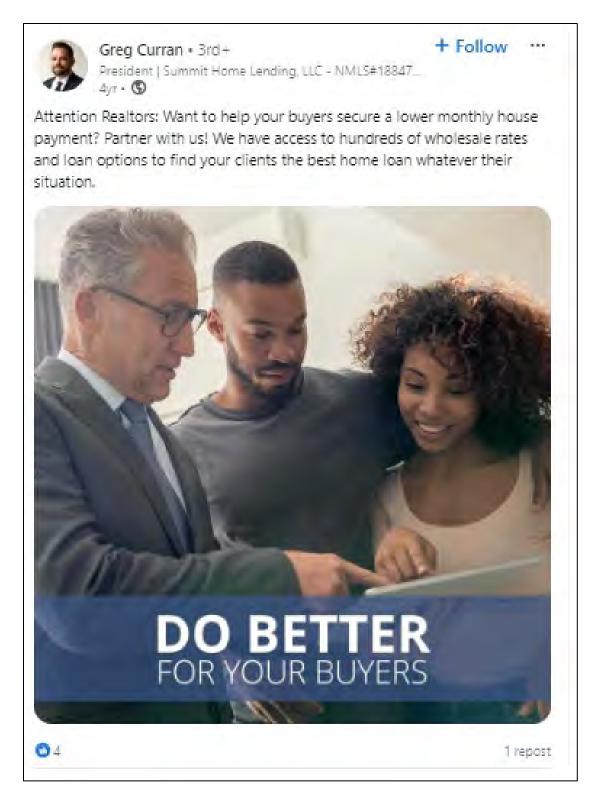
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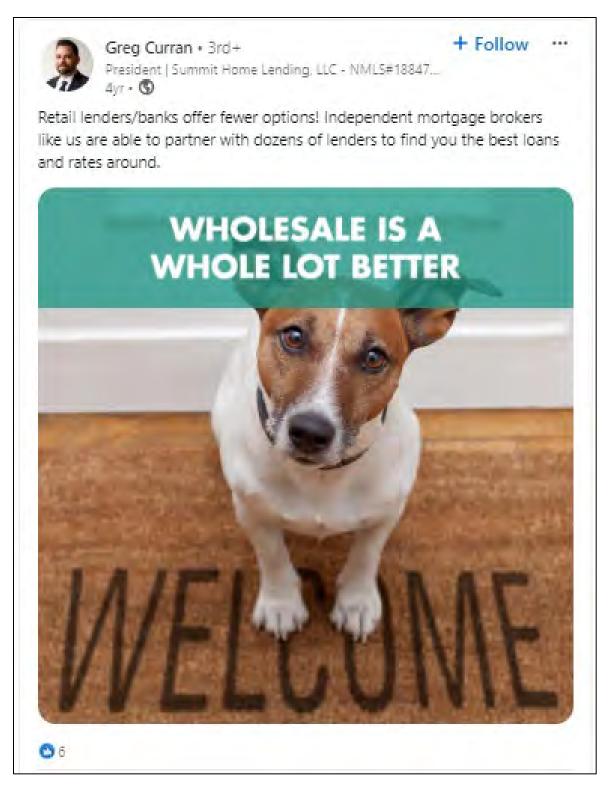
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tiffin/



Why Motto Mortgage?

You want local mortgage loan shopping. And that's just what we offer... but better. How, you ask? When you work with Motto, you get a neighborhood mortgage professional at a locally-owned office — plus the power of a national network.





Real people who really care.

The standard mortgage experience can be impersonal. Good thing we're not your grandma's stuffy mortgage company (or your college roommate's online lending giant). The mortgage professionals in your local Motto office have more time to advocate for you, answer all your questions, and be there for every step of the process — and beyond. Why? Because our national support team takes care of those mundane little tasks that usually take up other mortgage professionals' time. And most importantly, our home loan shoppers just really care.

Next >

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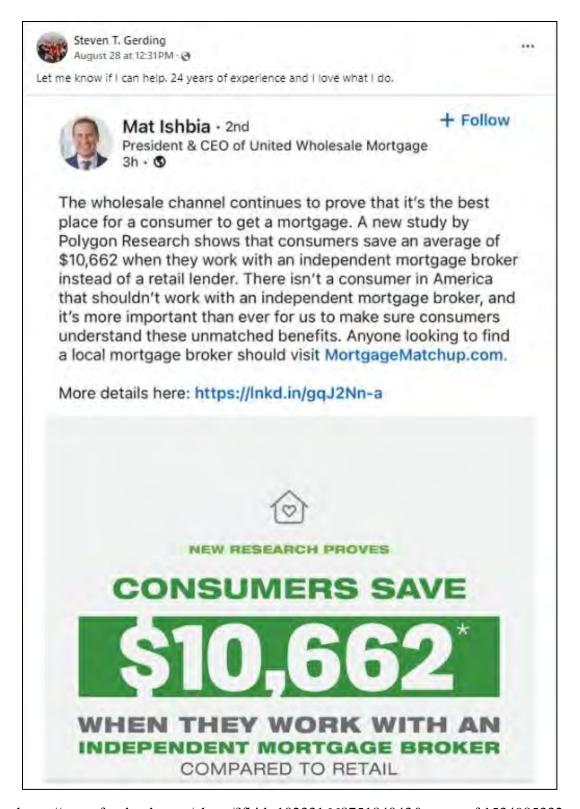
But wait. There's more to Motto Mortgage.

Sure, our super competitive interest rates, stellar customer service, and easier application process are our hallmarks. But we have a few other tricks up our sleeve.

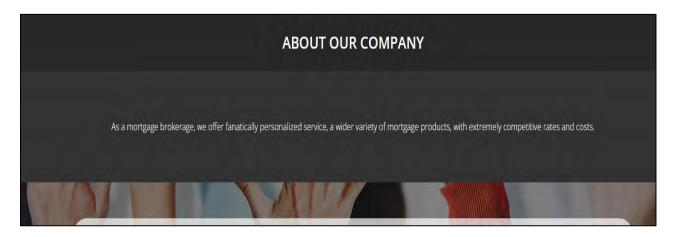
Many Motto offices are **one-stop-home-shops**. That's because they offer both real estate agents and mortgage professionals under one roof. Yup! You can talk house hunting and home loans in one place. And the best part? Your agent and mortgage pro will work so closely together that you might not even realize where one ends and the other begins — and that's a beautiful thing. Already have a real estate agent? Our mortgage professionals love working with new people too.

Oh, and we're also philanthropic. Remember that "local heart" we talked about? It's something we take seriously and it's why we started the Motto Mortgage Mission Against Hunger. Our network offices work to gather food and monetary donations for their neighborhood food banks and pantries... because community needs go far beyond housing.

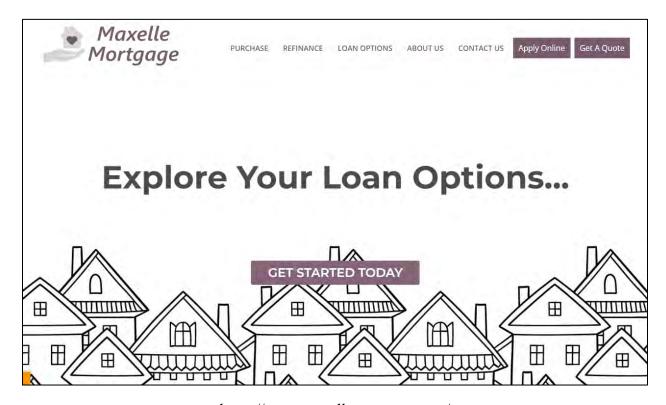
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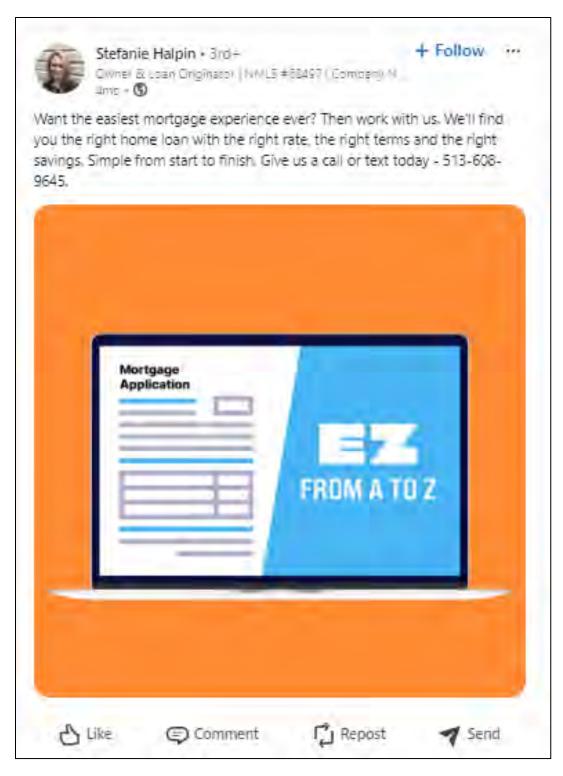
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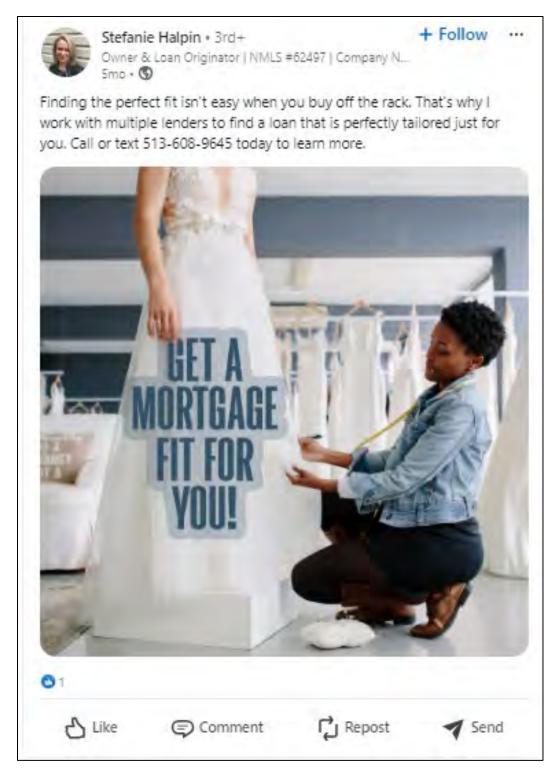
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IMPERIAL HOME LOANS

At Imperial Home Loans, our mission is to set a high standard in the mortgage industry. We are committed to quality customer service – putting the people we serve first. Our goal is to carefully guide you through the home loan process, so that you can confidently select the best mortgage for you and your family from the many mortgage options that are available today. After you select the loan that is best for you, we will work continuously on your behalf to help you achieve your dream of homeownership.

At Imperial Home Loans we strive to make you a client for life. We want to be your first choice each and every time you need a home loan. We always try to go above and beyond for you so that you will always feel confident referring your family and friends to us for their mortgage financing needs.

Take advantage of our expertise in the residential lending industry by applying online today. You will find that the skill, professionalism, and consideration we give to each of our clients makes getting your loan a worthwhile endeavor.

Give us a call today for a free, personalized consultation. You can also apply online. It is fast, secure, and easy.

https://imperialhl.com/about/



OUR SUCCESS IS YOUR SUCCESS

The Statewide Difference

When Keith Swisher, president of Statewide Mortgage, bought his first home in 2001, he knew that the complicated home-buying process could be done better. His idea was to redefine the mortgage process by focusing on the customer experience through building relationships with every client, 20 years later, this idea has evolved into a thriving company with a team built on the foundation of "doing what's right."

Statewide Mortgage is able to bridge the gap between convenience, quality customer service, and a wide variety of loan programs to better serve our clients.

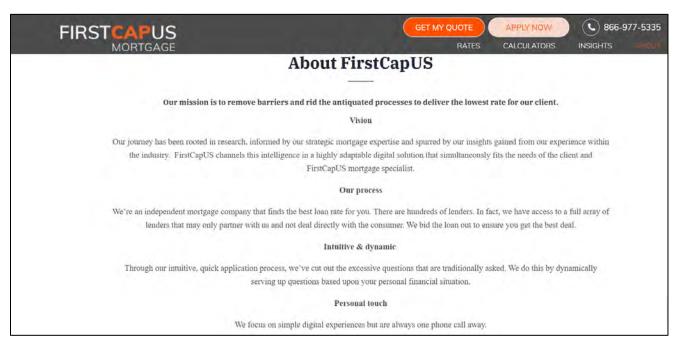
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Mary Pisciotta

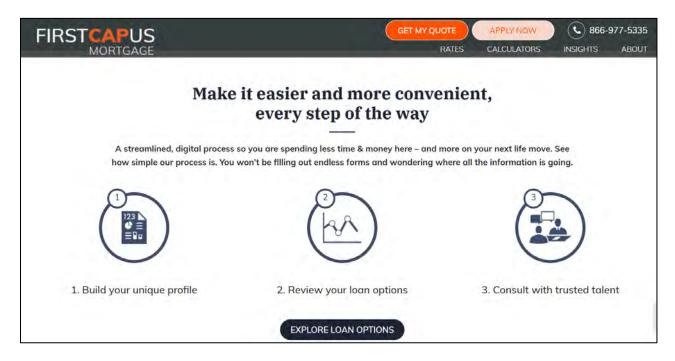
Posted By: FirstCapus

I am FirstCapUS's General Counsel. I keep the company in compliance with federal and state regulations. I have seen the ins and outs of the mortgage business and am aware of the challenges facing consumers today in light of all the options. I have firsthand knowledge of FirstCapUS's commitment to servicing its customers and ensuring that they fully understand the process and are getting the absolutely best rate possible. It is a privilege and honor to be part of the FirstCap team. As brief background, I grew up in Upper Arlington and attended Watterson High School. I obtained my undergraduate degree from Denison University and my J.D., magna cum laude, from Capital Law. My background is in litigation and I have worked for several law firms and insurance companies. I currently live in Merion Village with my husband and two dogs, Mitzy and Cece.

https://firstcapus.com/my_team/perspiciatis-unde-omni-2/



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Our community means everything to us

Headquartered in Columbus, Ohio, we service all of Ohio. Our focus is growing our business starting in the Midwest. We know that no one wants to work with someone who sees them as a number.

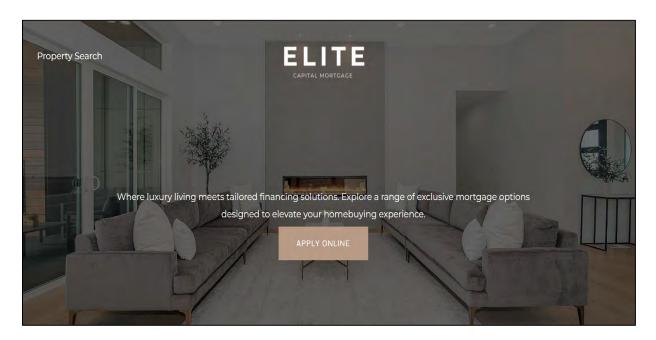
We see our customers as our neighbors. Because of that, we treat each client with the utmost respect & care. We want to ensure that you understand the marketplace and get the very best experience when getting a loan for your purchase or refinance.



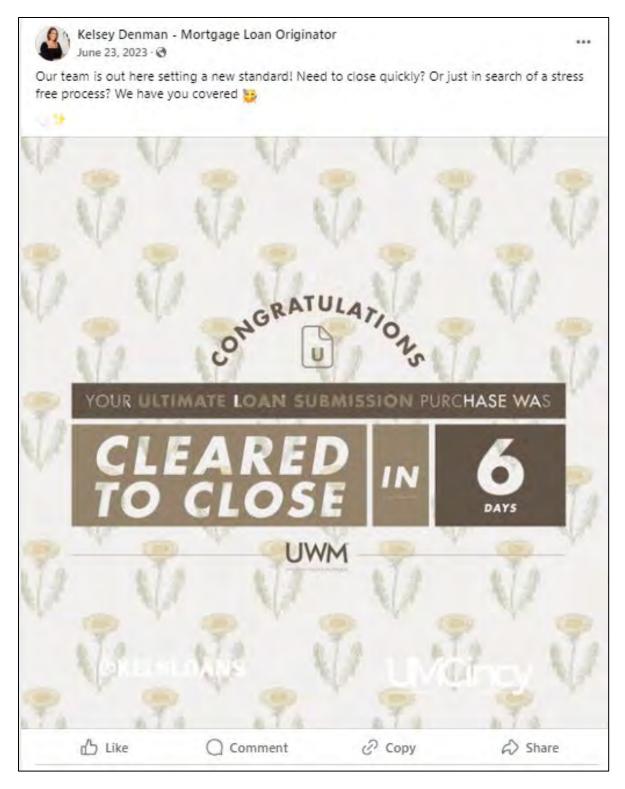
I put Cory to the test for best rate and speed at closing. We went in contract in June and Cory only had 2.5 weeks to close. He gave me the best rate and locked in, and worked overtime hours plus weekends to see that I was very satisfied. We closed on time with everything in order. I must admit I was kind of skeptical not hearing of the name of his bank before, but with his knowledge and performance he came through 10 fold. I would recommend him to anyone. Thanks again for your help Cory!

Bankrate review

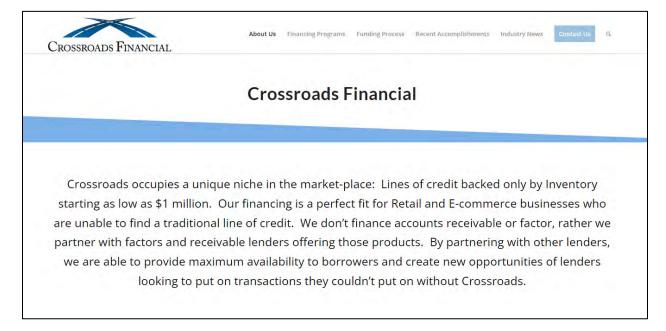
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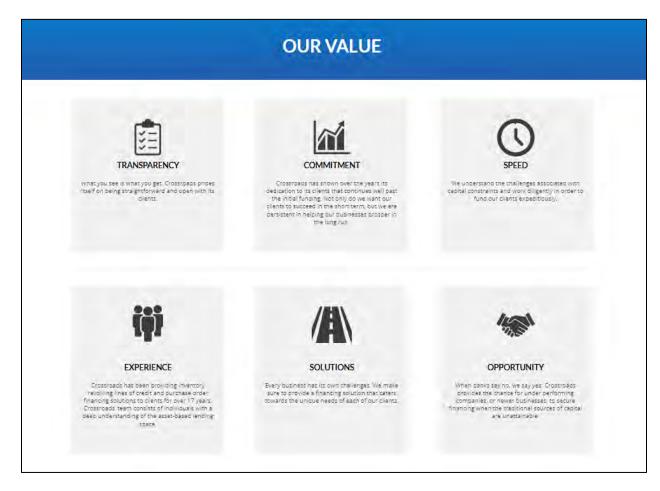
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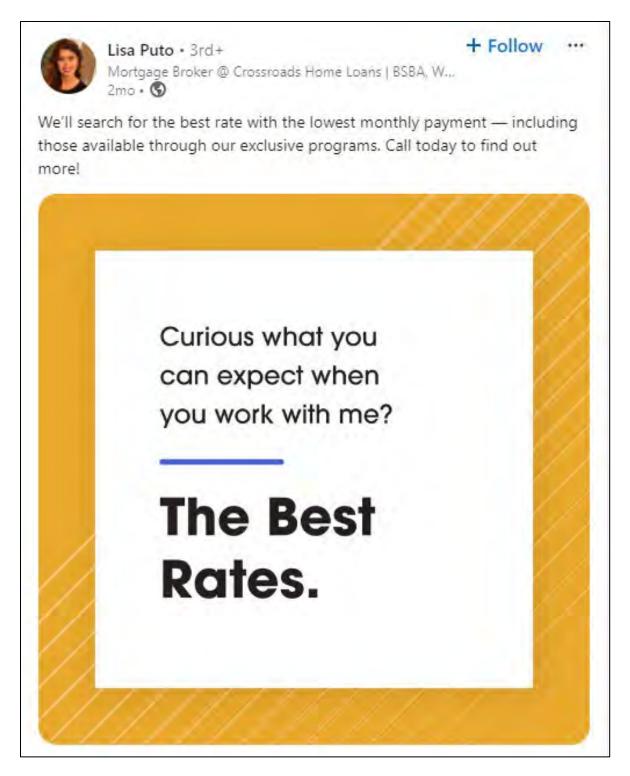
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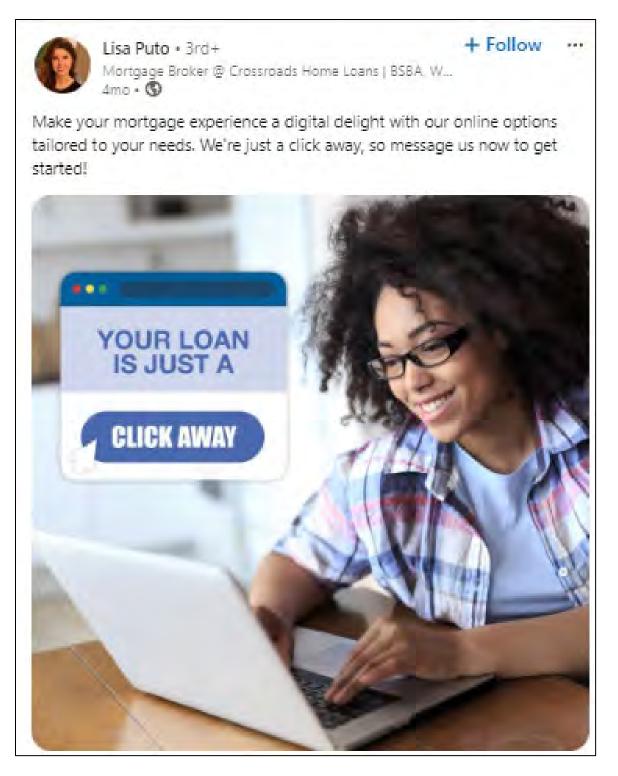
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Lisa Puto, LinkedIn, Apr. 22, 2024,

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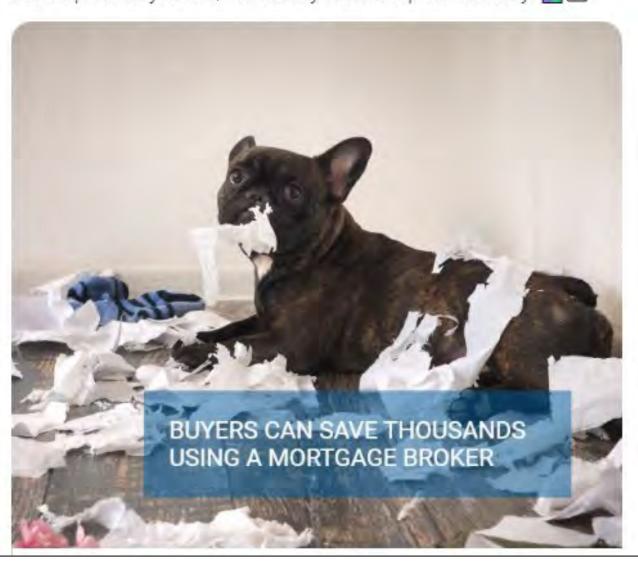
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Mortgage Broker @ Crossroads Home Loans | BSBA, W...

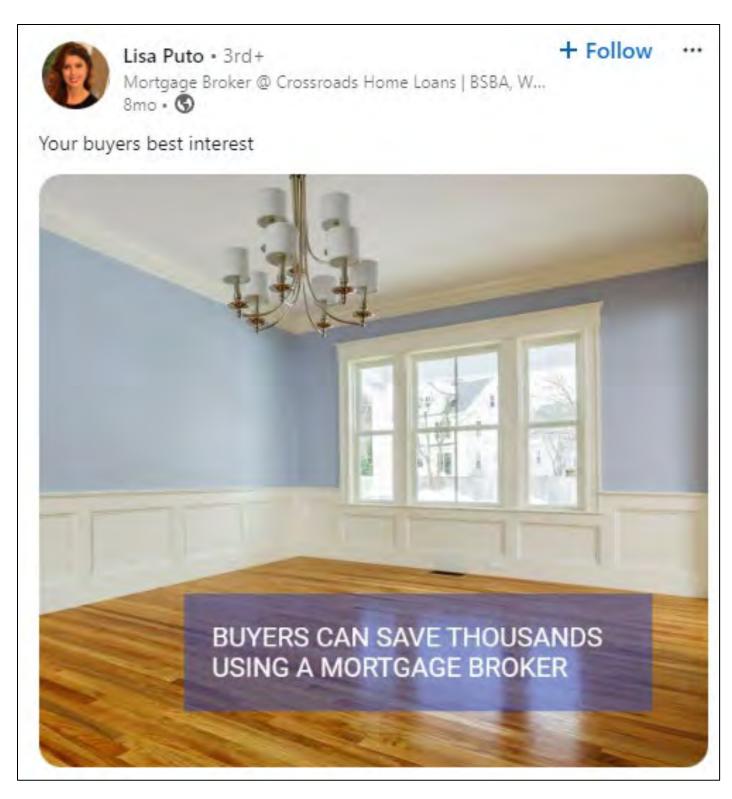
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The homebuying process can be stressful, and banks don't always put your interests first as their options are limited to their guidelines and interest rates. As a mortgage broker we assure we customize & shop the best options. Call, email or data enter today for loan options.



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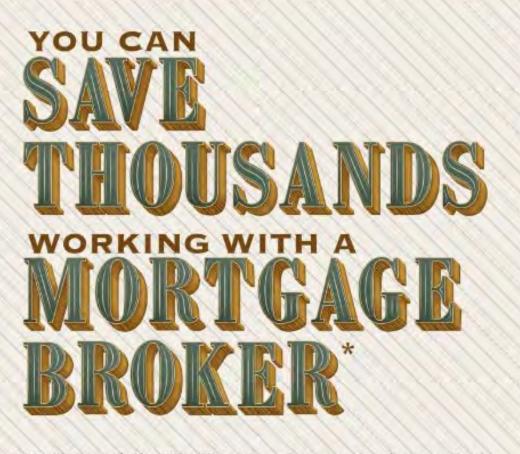


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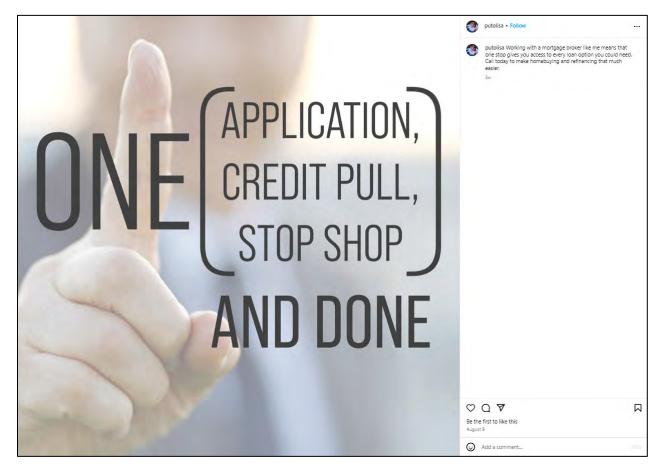
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Did you know that working with an mortgage broker could save you up to on average \$9,407* on your loan? Just imagine the more of a home you may be able to purchase in lower payments, lower down payment or reduced mortgage insurance too. Data enter, email or Call us today.



*2021 HMDA compiled by AIME: NDP Analytics — Comparisons based on conventional conforming 30-year fixed loans for debt-to-income ratio 41-45% between top 10 wholesalers and top 10 non-bank retailers; low income defined as less than \$52,000; interest savings assumes full term of loan.

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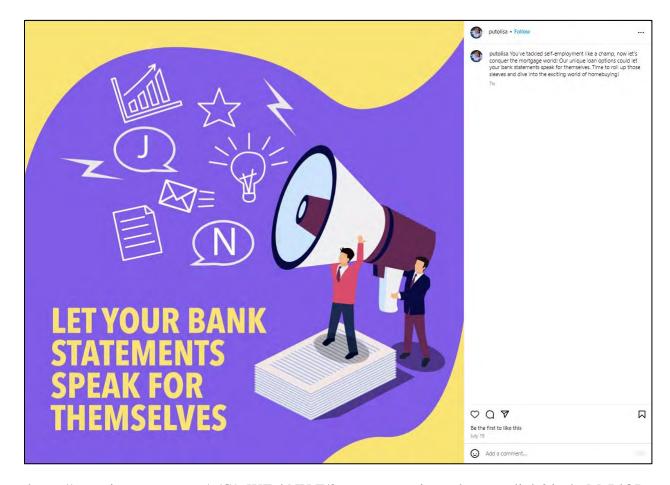
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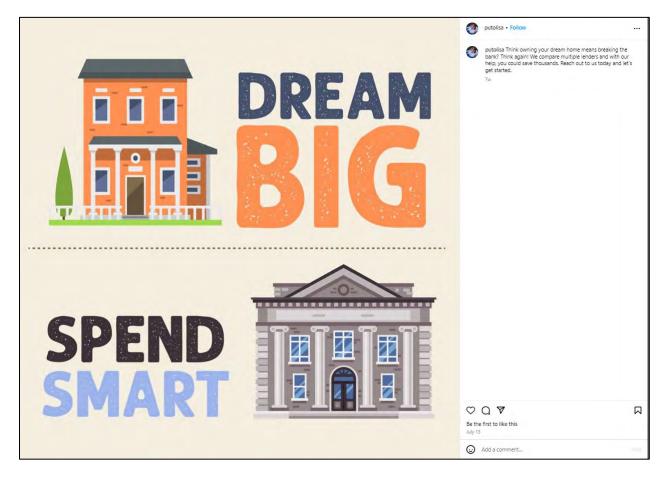
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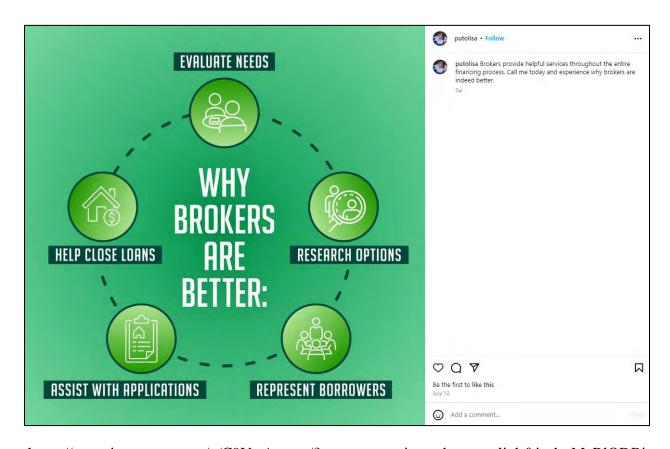
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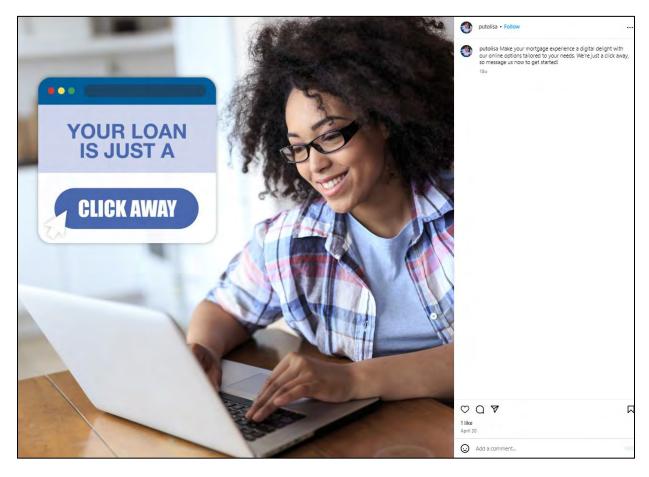
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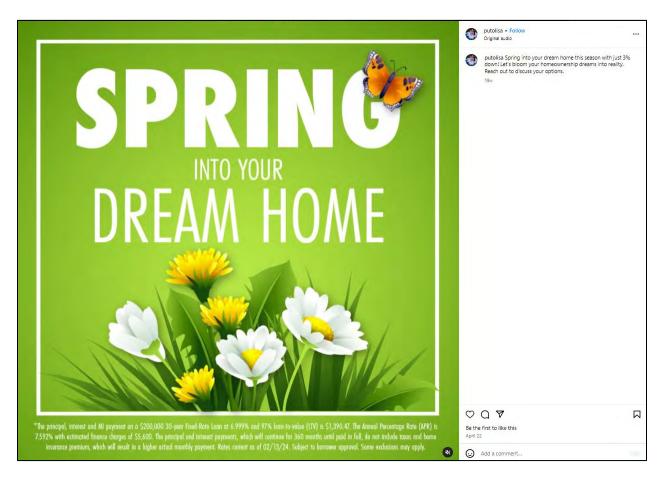
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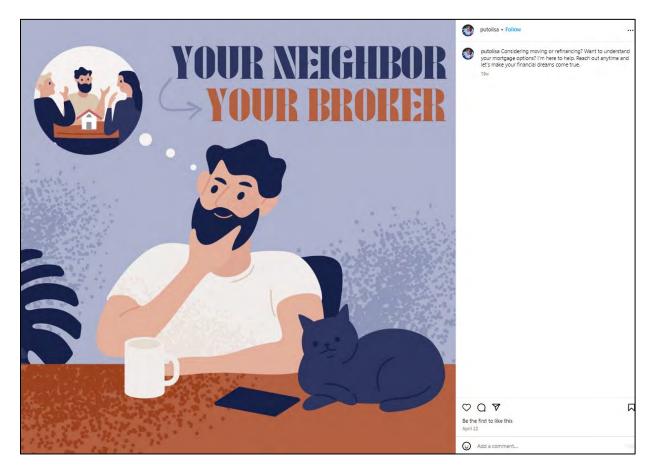
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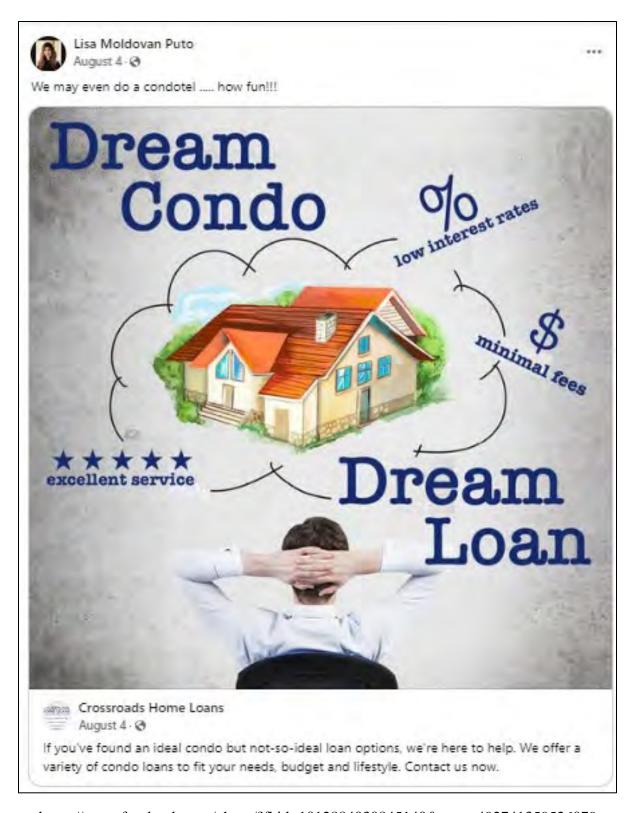
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Franklin Financial Group - Best Loan Product Selection in OH KY & FL.

Franklin Financial Group is a reputable mortgage broker committed to providing the best loan solutions for various types of loans, catering to the specific needs of our diverse clientele. Our goal is to offer the Best Loan Product Selection in the market, ensuring that our clients receive the most suitable loan options to meet their unique requirements. Whether its FHA, VA, USDA, Jumbo, Conventional, or Nonqm loans, we have the expertise and resources to assist our clients in securing the ideal loan for their home financing needs. We have been been originating mortgages since 1999 but we believe it's more about YOU!

It's Your Home, Your Mortgage and Your Future.

As a primarily referral-based company, we strive to provide you the ultimate in customer service to ensure you have a smooth transaction and total satisfaction as the end result of your mortgage process. Our mission is to serve our customers with honesty, integrity and competence. We work to provide home loans to our clients while providing them with the lowest interest rates and closing costs we can find. Furthermore, we pledge to help borrowers overcome roadblocks that can arise while securing a loan.

We are "Mortgage Consultants for YOUR Life"

https://www.franklinfinancialgroup.com/

Find the Right Mortgage Option for You!

Tools to help you get started



Apply Now

Our Secure Application takes about 7-10 minutes to complete, and is required for a "Pre-Approval."

You will be contacted once your application is submitted.



Refinance

We're committed to helping you refinance with the lowest rates and fees in the industry today. Check out our Low Rates, Calculate your Payment, or Start the Process Today!



Loan Programs

Explore various loan program options to find the right fit for you and your family. We support everything from fixed rate to adjustable rate mortgages.



Mortgage Calculators

Our mortgage calculators help you hone in on the loan options that are best for you. Calculate your mortgage payments, affordability, and more.



Purchase

Whether you're buying your first home or your dream home, we have a mortgage solution for you. Get your custom rate quote today.



Step by Step Guide

Learn about the Loan Process end to end. We have made it our mission to help you at every step of the way so you get the best loan option available to you.

https://www.franklinfinancialgroup.com/

About Us	Get a Quick Quote	
The mortgage process really is about you but we can share a little bit about ourselves as well.	First Name *	
Franklin Financial Group, Inc. is a mortgage brokerage located in Anderson Township, a suburb of Cincinnati, Ohio. We have been operating and originating mortgages in Ohio, Kentucky and Florida since 1999. To date, we have originated over \$361 Million Dollars in mortgages. Being a small brokerage we offer a boutique-style experience focusing on	Last Name *	
every detail of our customers' needs and working to design a customized mortgage loan program tailored towards each individual scenario and situation.	Email *	
We operate under the highest standards of honesty, integrity and fairness, providing you with a mortgage to meet your unique needs. Being brokers we are able to shop our		
nationwide lenders in order to find your perfect mortgage solution. We have an A+ Rating with the Better Business Bureau, proving we are extremely dedicated to the mortgage profession and bound by the highest ethics and standards.	Home Phone *	
See all of our customer reviews by scrolling down on the Home page!	Loan Amount *	
As a primarily referral-based company, we truly strive to provide you the ultimate in	- Select an option -	~
customer service to ensure you have a smooth transaction and total satisfaction as the end result of your mortgage process.	Property Value *	
Our goal is to become "Mortgage Consultants for YOUR Life"	- Select an option -	~

https://www.franklinfinancialgroup.com/about-us

Meet The Team



Kevin Ary, President (NMLS # 4599)

I have over 27 years of mortgage broker experience having started out my mortgage career in 1996. I have owned and operated Franklin Financial Group for over 24 of those years, as the brokerage was formed in December of 1999. I operate primarily on referrals and work to provide the best products available for each of my customers.

Graduate of Miami University, Richard T. Farmer School of Business

Received the National Designation as a Certified Residential Mortgage Specialist (CRMS)

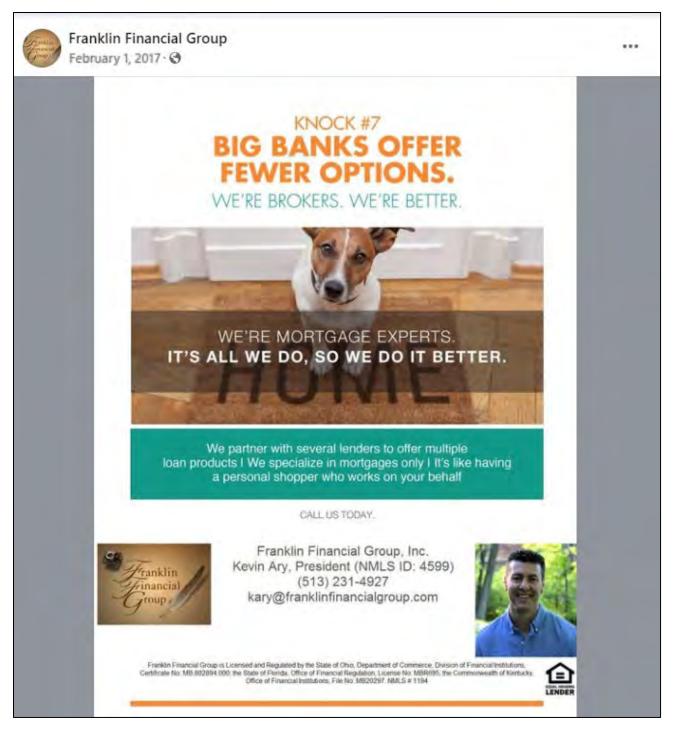
Recipient of the National Association of Mortgage Brokers Lending Integrity Seal of Approval

Top 1% Certified Partner with UWM in 2020 and 2021

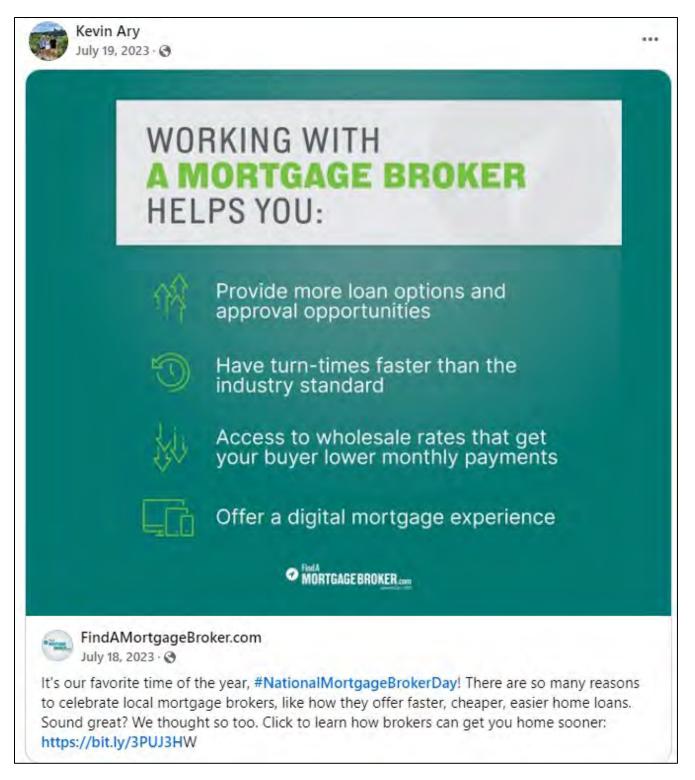
Top 20 Ohio Purchase Loan Officer with UWM in 2018, 2019 and 2021

Thirteen-Year Winner of the Five Star Mortgage Professional Award (2012-2024)

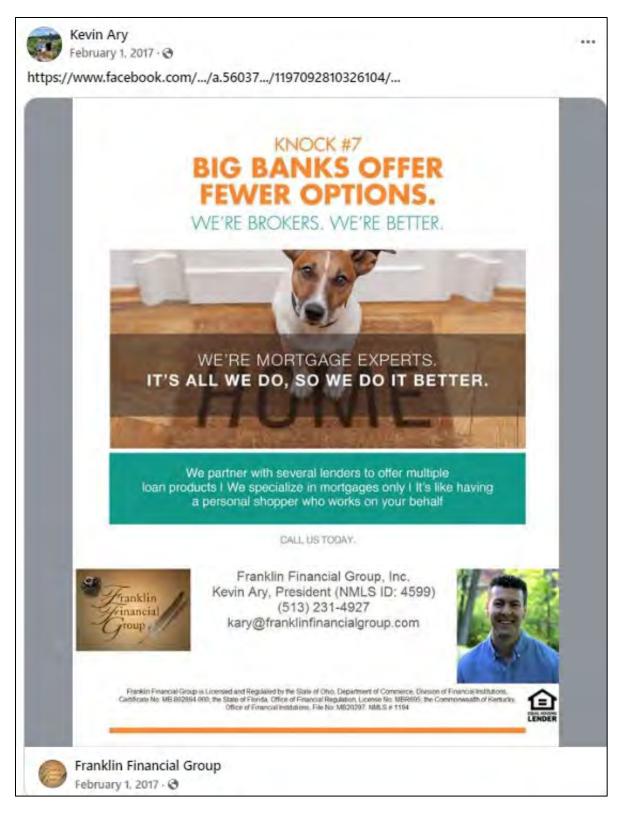
https://www.franklinfinancialgroup.com/meet-the-team



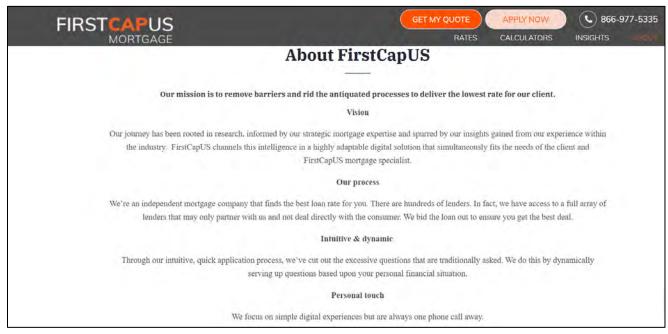
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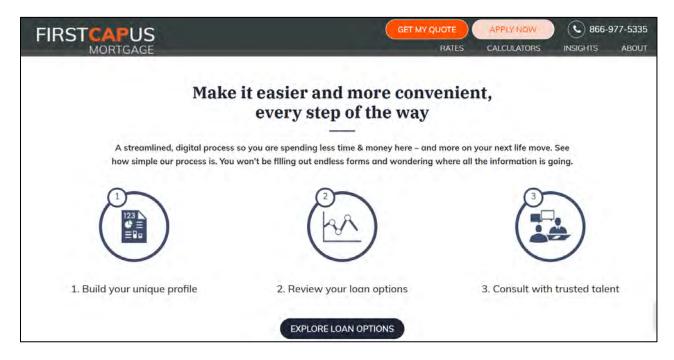
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https://firstcapus.com/about/



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Our community means everything to us

Headquartered in Columbus, Ohio, we service all of Ohio. Our focus is growing our business starting in the Midwest. We know that no one wants to work with someone who sees them as a number.

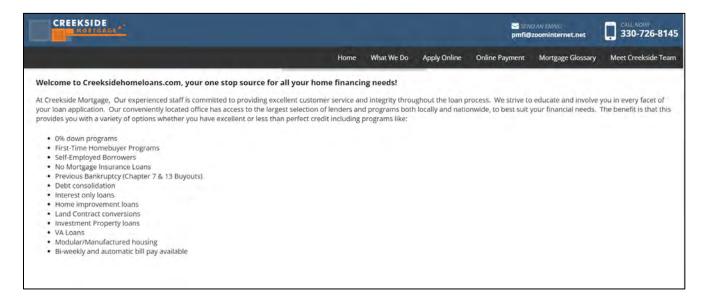
We see our customers as our neighbors. Because of that, we treat each client with the utmost respect & care. We want to ensure that you understand the marketplace and get the very best experience when getting a loan for your purchase or refinance.



I put Cory to the test for best rate and speed at closing. We went in contract in June and Cory only had 2.5 weeks to close. He gave me the best rate and locked in, and worked overtime hours plus weekends to see that I was very satisfied. We closed on time with everything in order. I must admit I was kind of skeptical not hearing of the name of his bank before, but with his knowledge and performance he came through 10 fold. I would recommend him to anyone. Thanks again for your help Cory!

Bankrate review

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http://creeksidehomeloans.com/



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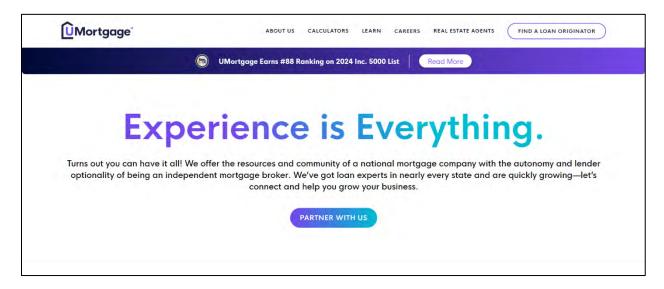
As the managing partner and broker of record for Creekside Mortgage, I am committed to delivering superior service. Your home purchase or mortgage refinance will be the most important financial decision that you will ever make and I truly understand that. Lonsiated myself a mortgage planner, not a mortgage broker. I want to see my client's wealth grow as our relationship grows through the years. When searching for a mortgage, It is important to know all of your financing options, have all your questions answered and to know that you are receiving the best information from an experienced loan officer who cares about you and your family. I believe in providing you with the best mortgage financing that fits your needs, not what is the most profitable for my company. I am proud that 90% of my business comes from past referrals because I believe that it is easier, more cost effective, and more satisfying to keep an existing customer than it is to canvas for new customers. The only way to achieve this kind of success is by providing great service along with valuable advice and competitive products and rates. My education background has given me a great foundation. I received a degree from Westminster College in 1998. After graduation, I entered the mortgage industry full time in Butler, Pennsylvania. It is the only career that I ever pursued. I loved it then and I love it today. Family is always first. It is the key to my success. I have a beautiful wife named Danielle, a wonderful 15 year old daughter named Alyssa, a lovely 12 year old daugh

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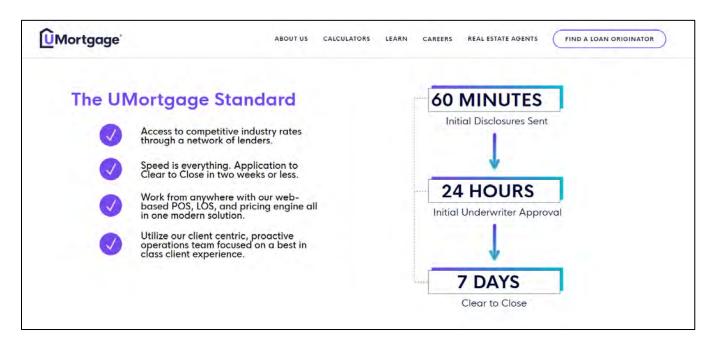
CLIENTS PROMISE

Our primary responsibilities are to preserve our clients' financial values and to help them achieve their financial goals. We exercise careful diligence to ensure that they enjoy the benefits of the most knowledgeable resources in all areas of their financial management.

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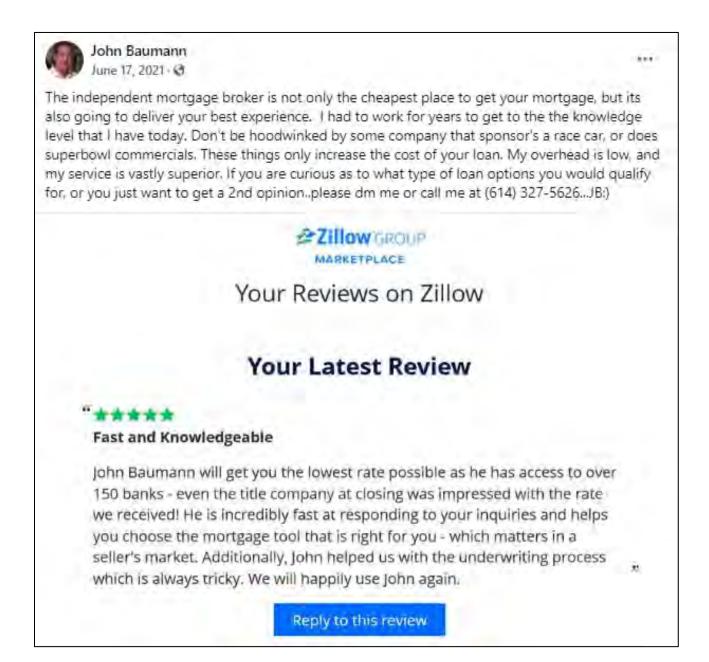
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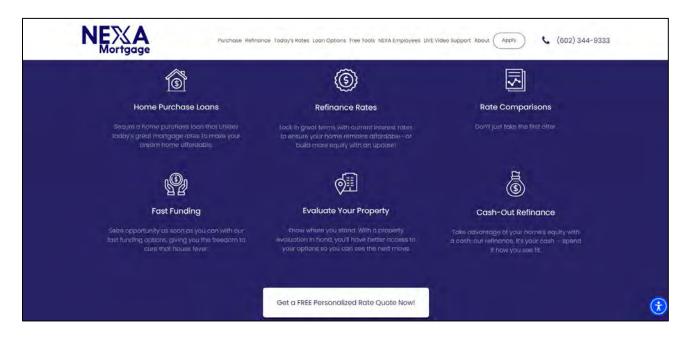
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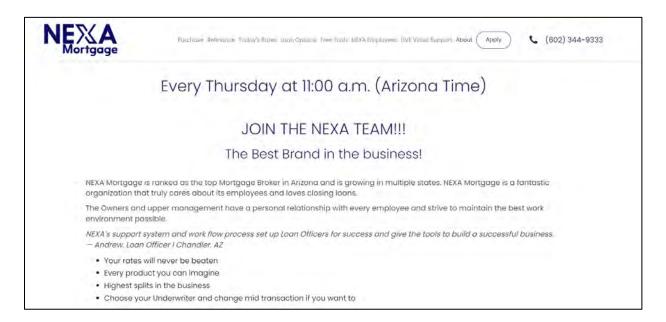
There are only two ways I get business. Either I served you in the past, or you heard about me through someone I have served in the past. There is a lot to deliver on a customer experience that ultimately makes me "referable". I love it, because the customer gets limosine service, and uber rates. I can do this because my overhead is low, and as a independent broker I have dozens of banks that I can place a loan with. Don't get snared by a super bowl ad..(They cost a lot of money, and don't ultimately provide you with any value)



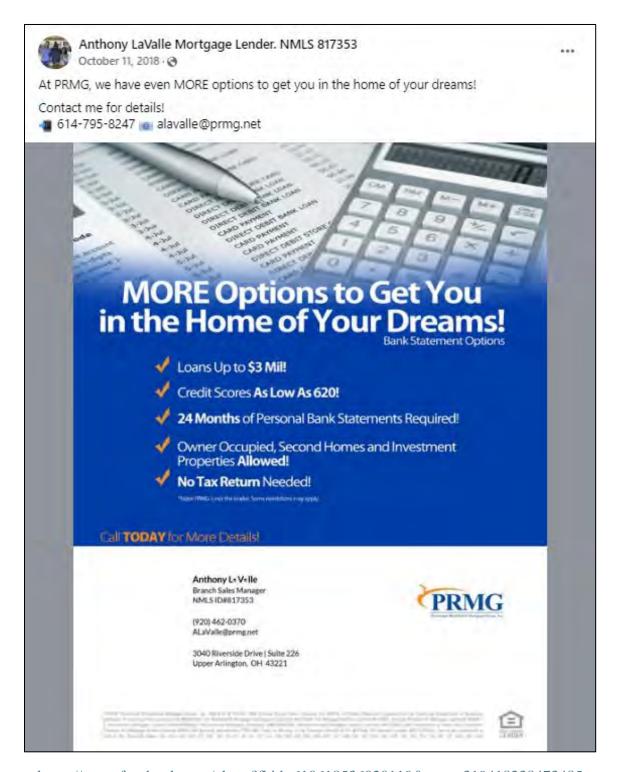
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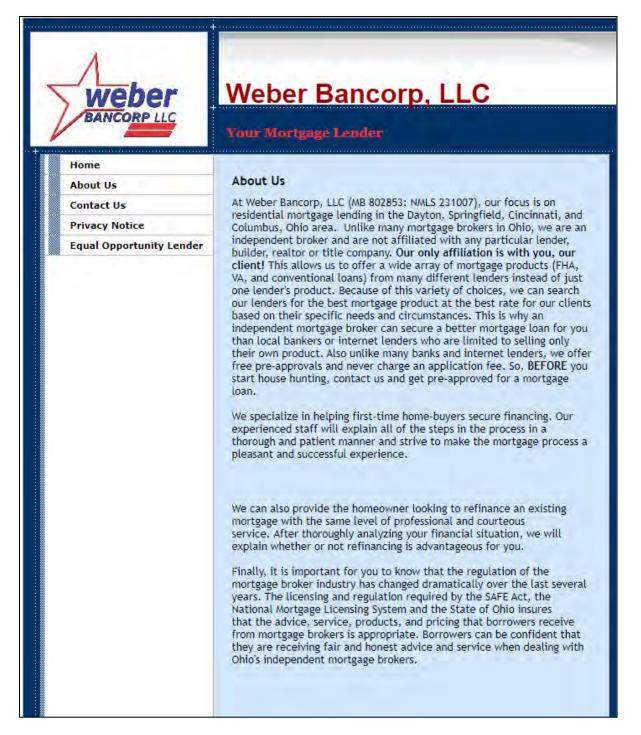
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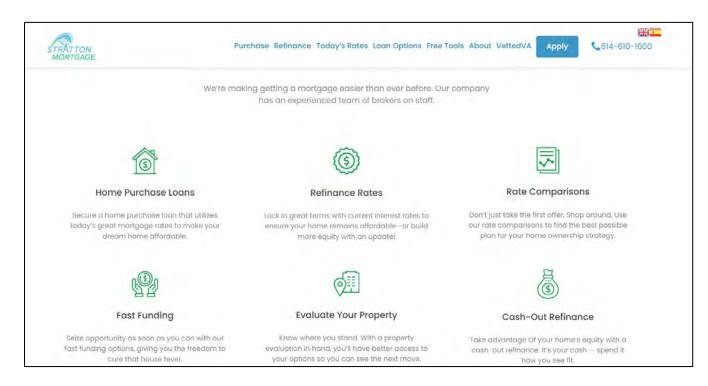
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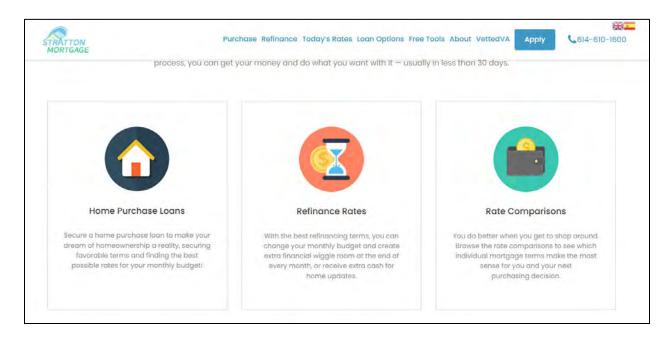
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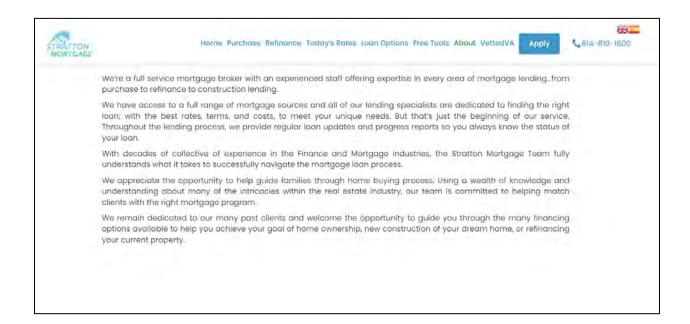
http://weberbancorp.com/aboutus.html



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Welcome to MAS Financing

We specialize in residential mortgages.

At MAS Financing, we will find a loan that fits each borrower. Unlike big banks that have "order takers" helping you with your loan, we have highly skilled loan consultants. Our consultants know what it takes to get through underwriting quickly. Also, the big banks have a limited number of lending options available and their loan programs are one size fits all. We have relationships with many lenders. We will find the lender that offers rates good for your scenario. No matter your needs, we are here to help.



Great customer service

At MAS Financing we take pride in our great customer service. Our staff is here for you, so don't hesitate to contact us if you have any questions, problems or maybe a suggestion. We would love to hear from you.

Clients come first

We make sure our clients get the best support from our staff. We will walk you through the whole mortgage process and ensure your transactions close smoothly.

We offer superior loans and mortgages.

MAS Financing works with multiple lenders. We can provide our clients with extremely competitive pricing. Now you can do all your comparison shopping with one company without wasting time with several banks or brokers.

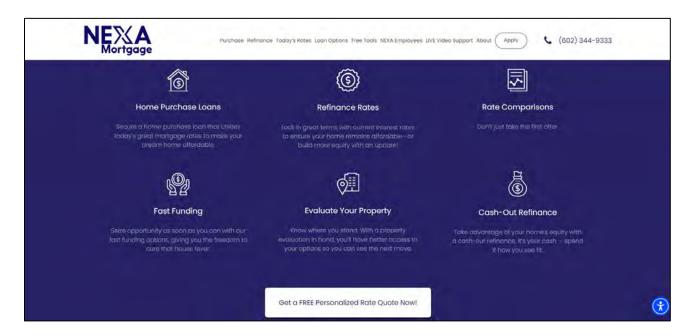
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Welcome To Entrust Mortgage, LLC

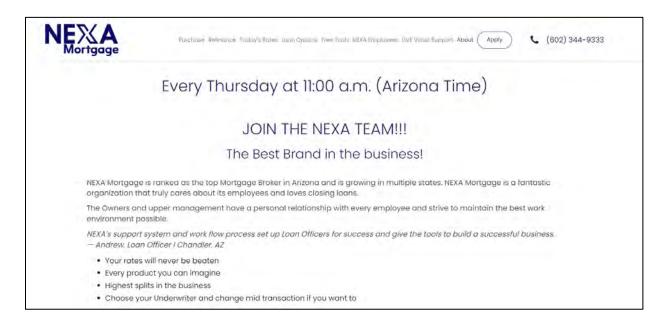
At Entrust Mortgage, LLC, we treat each customer as an individual, not a number. We don't place you into a loan profile formula created by the banking industry. We use "common sense" and will help you obtain the best loan possible. We represent a wide range of "A" rated lenders with first quality rates to private "hardship" lenders.

We work with more than 100 investors. This allows us to get you the best rates on all types of loan programs including: 30yr mortgage, 20yr mortgage, 10yr mortgage, 10yr mortgage, 10yr mortgage, 10yr ARMS, 3yr ARMS, 5yr ARMS, Conventional, Jumbo, Home Equity Lines, VA and Commercial. Whether your situation calls for Full Documents, No Documents, Non-Owner Occupied (Investor) or Multi-Family, we'll fit your needs!

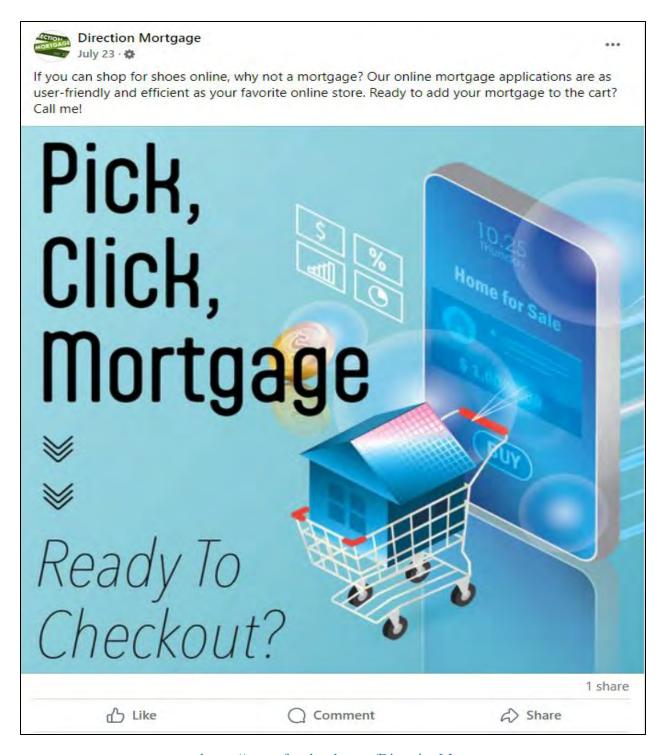
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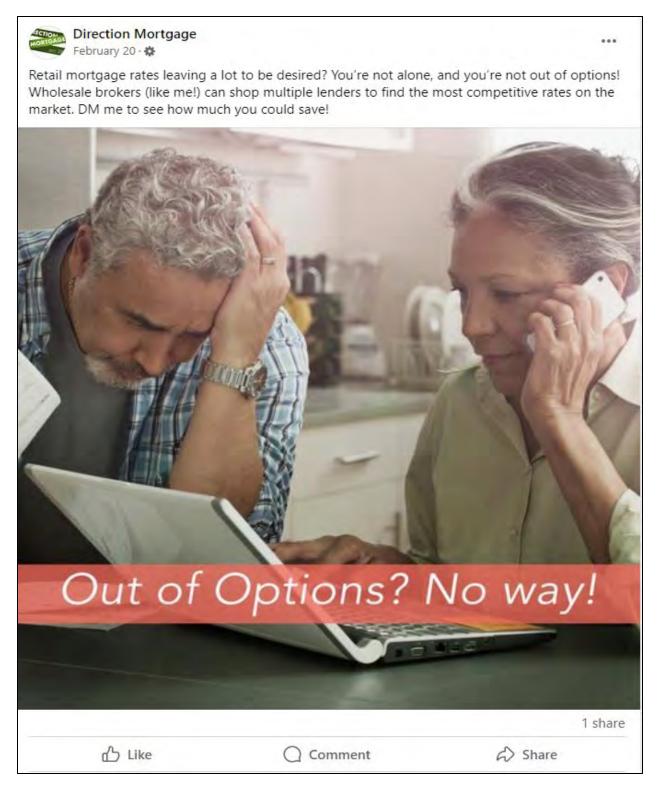
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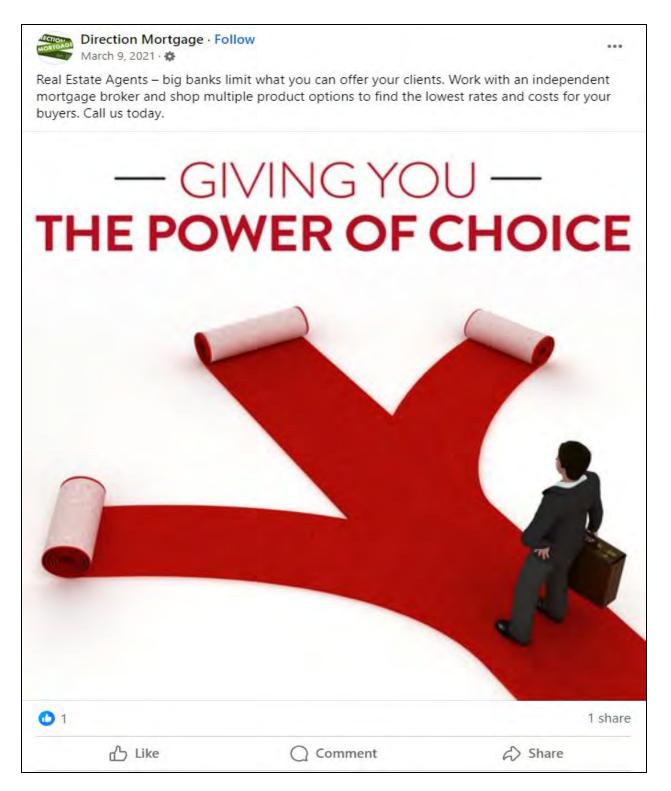
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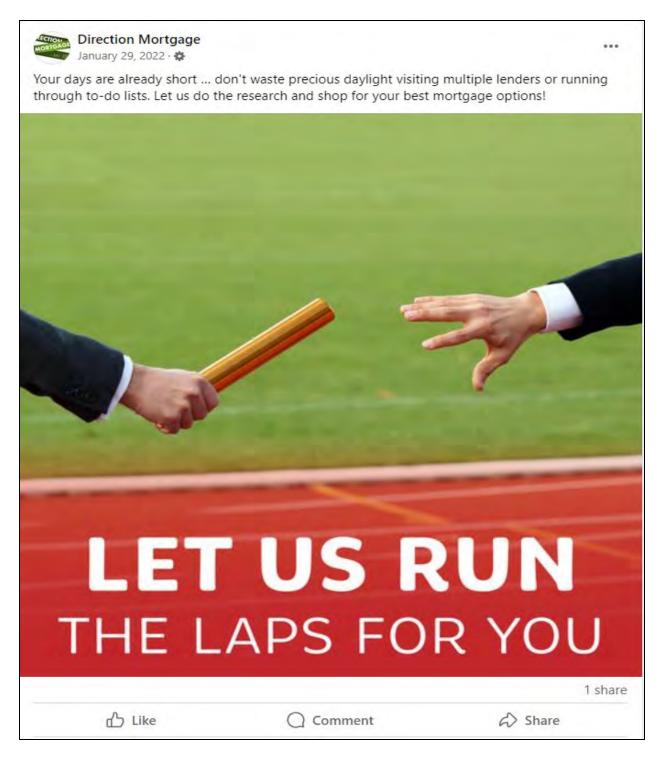


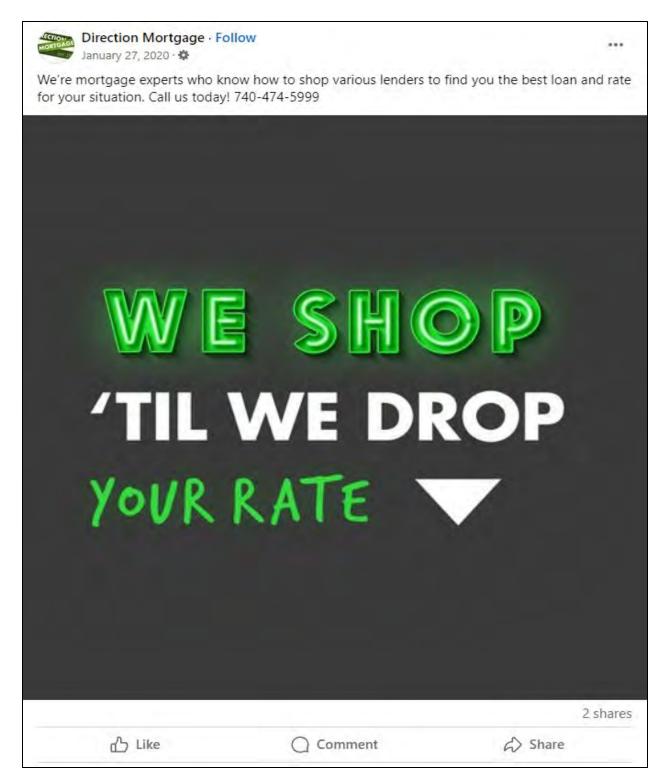


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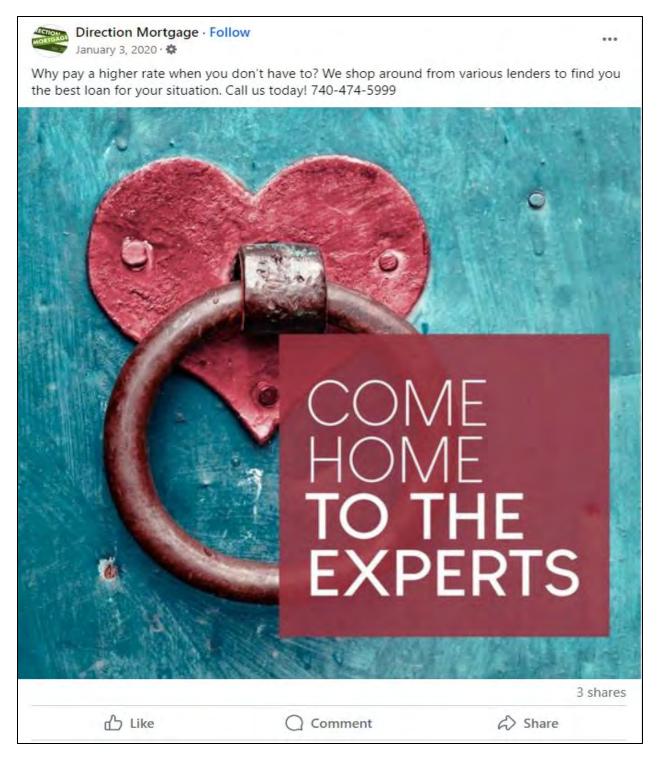
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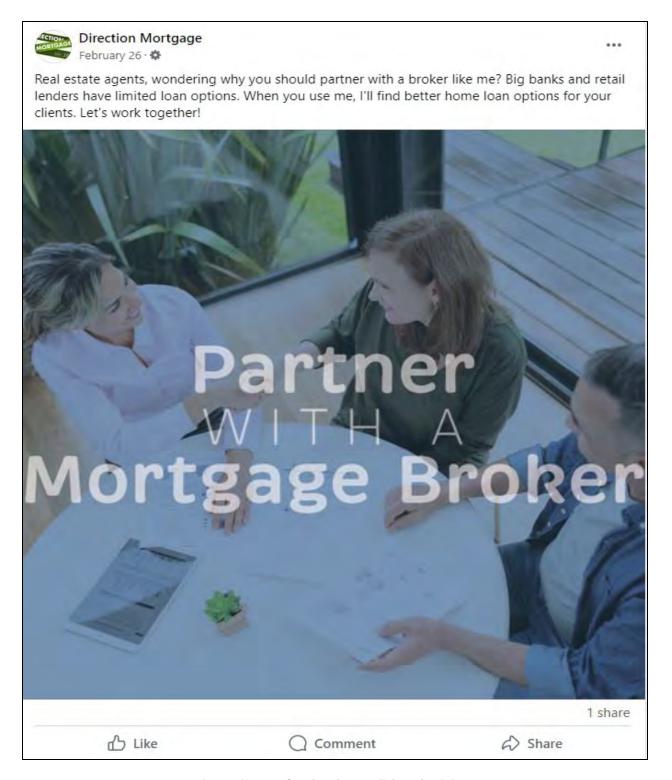
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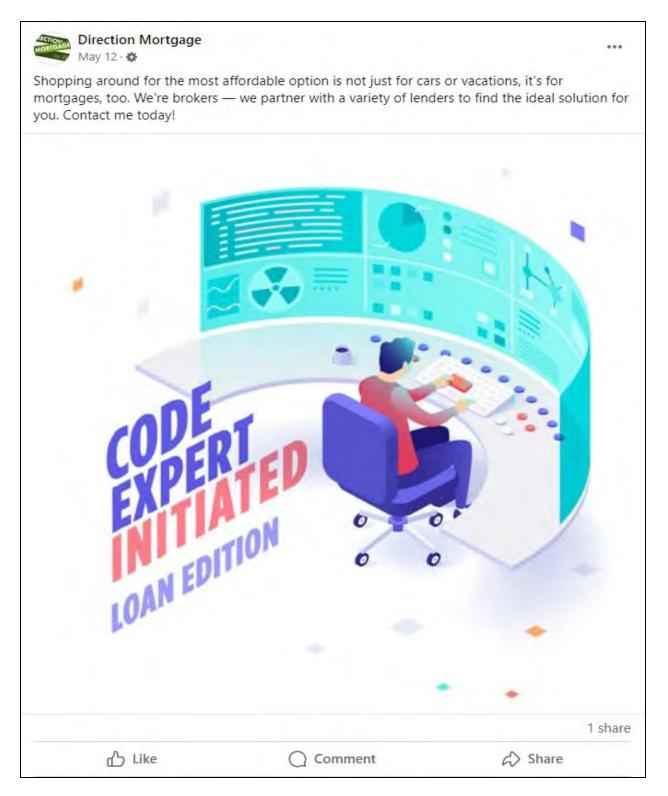
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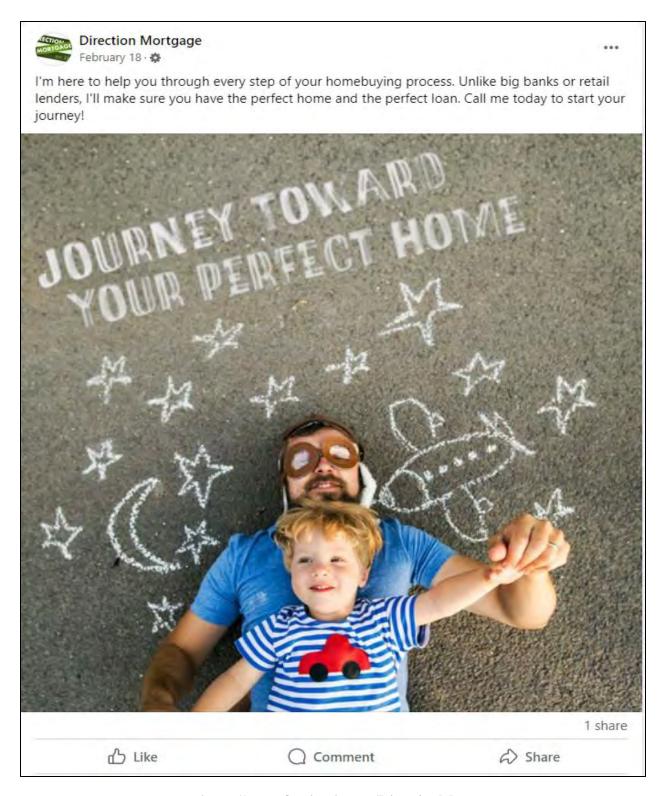
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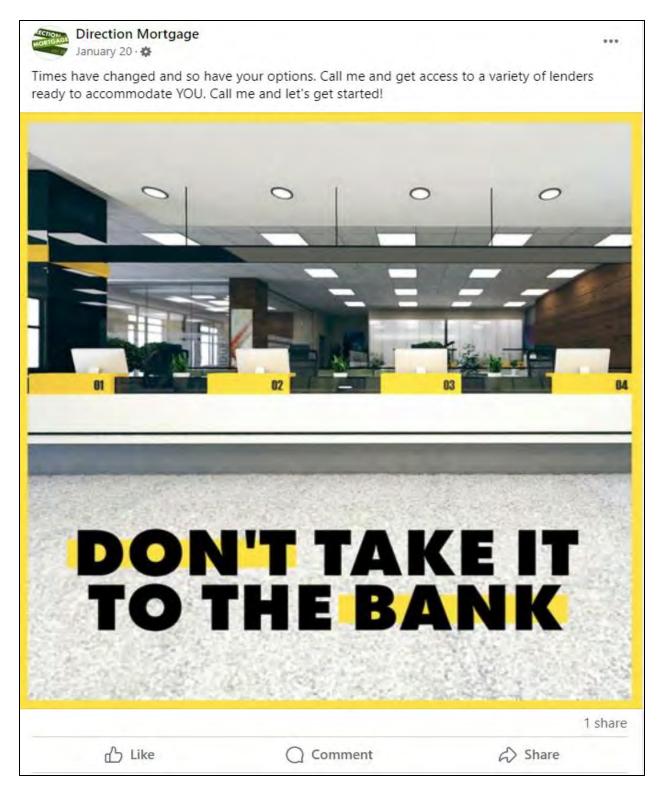
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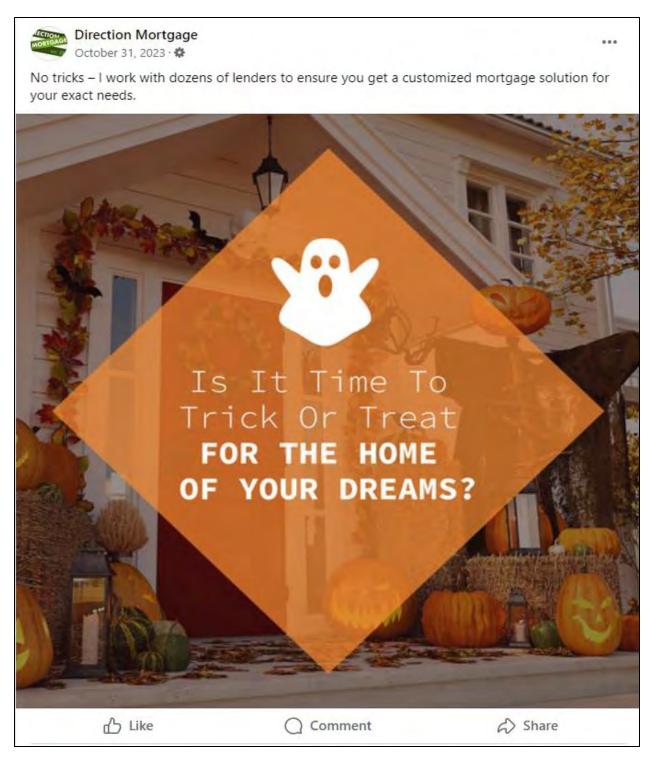




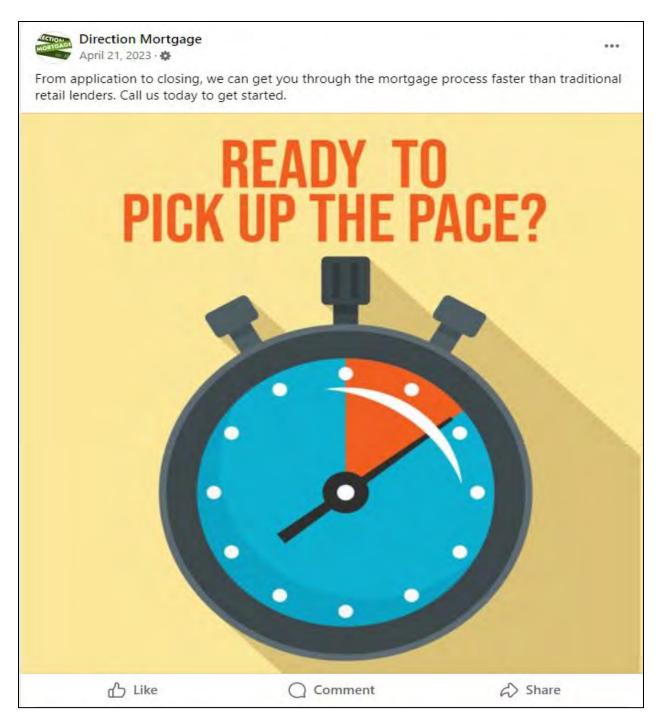
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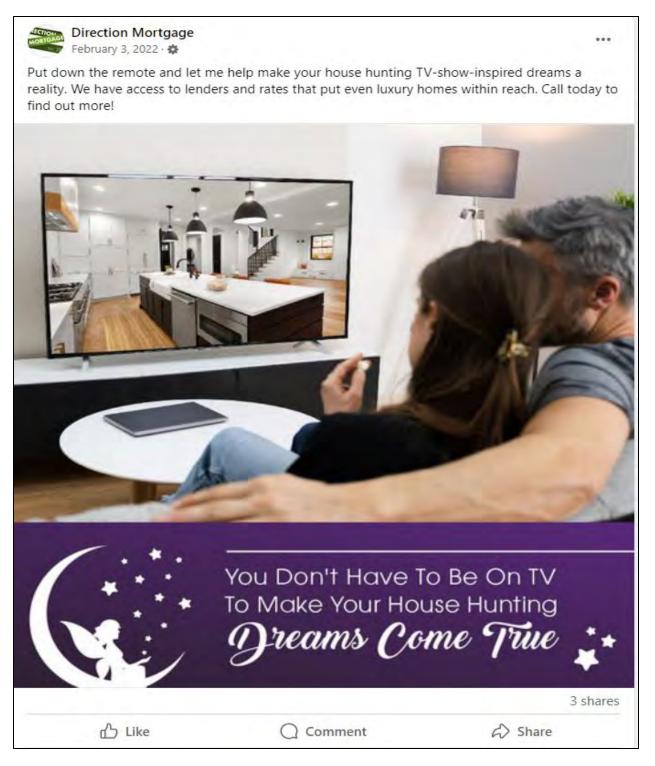
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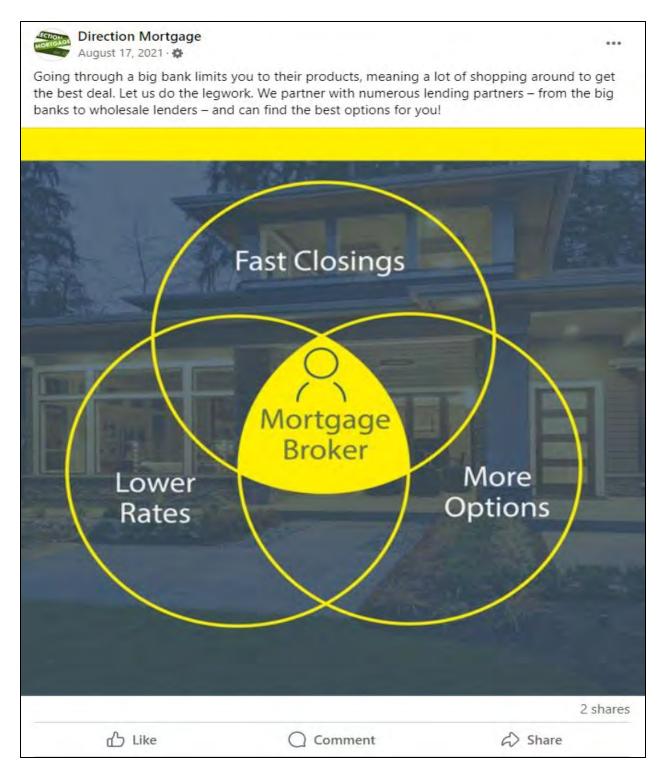
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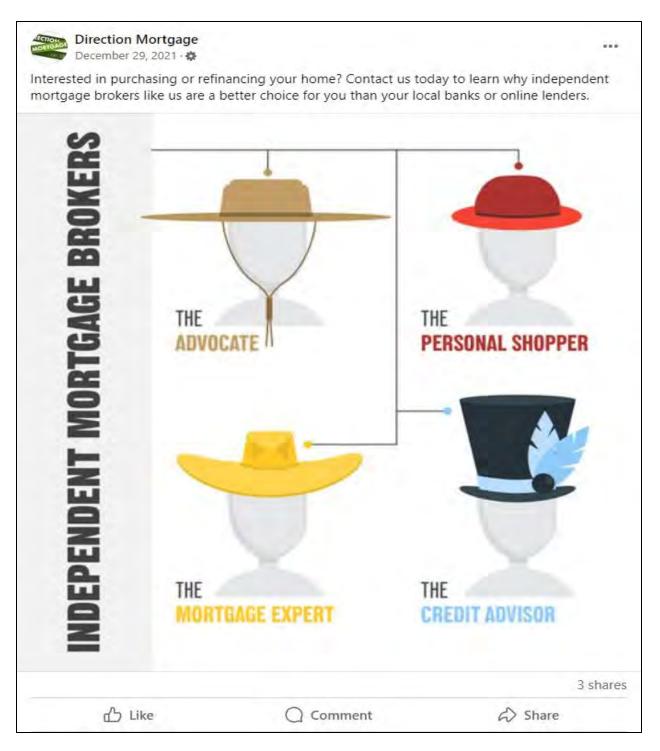
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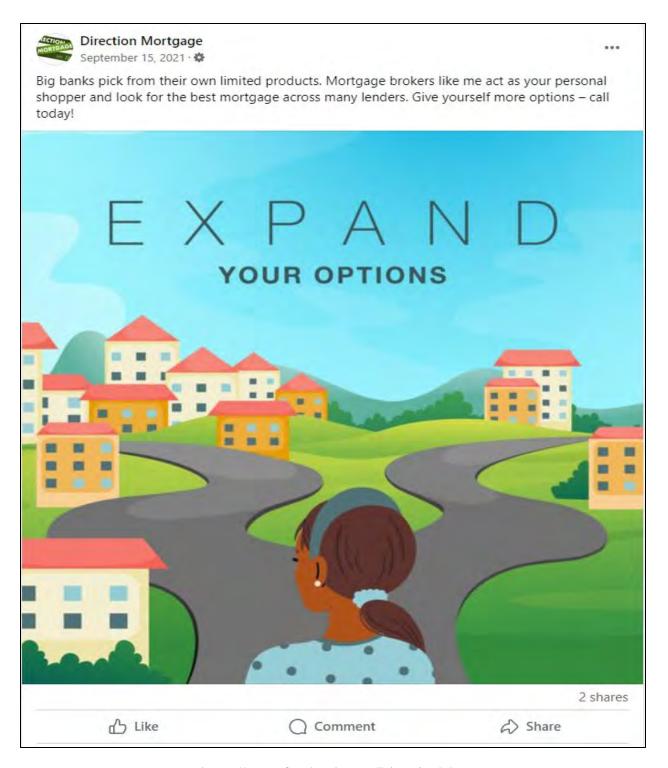
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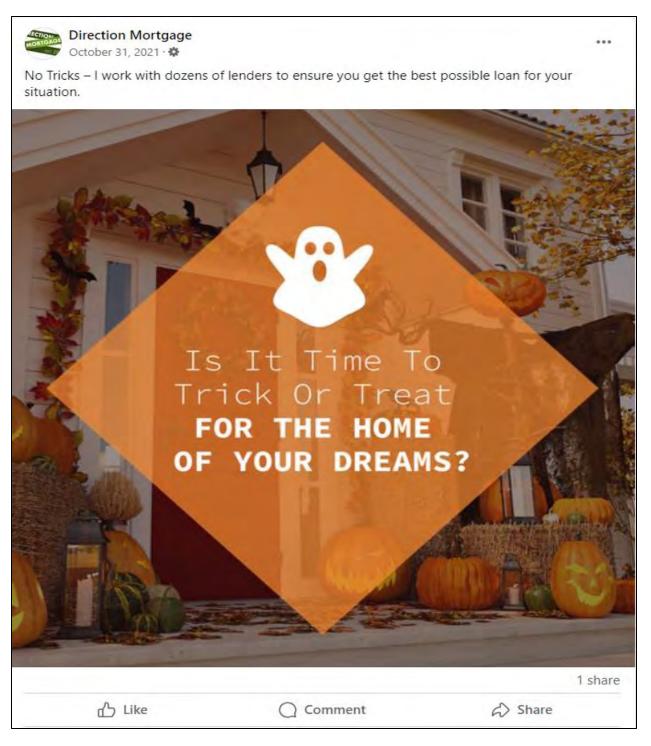
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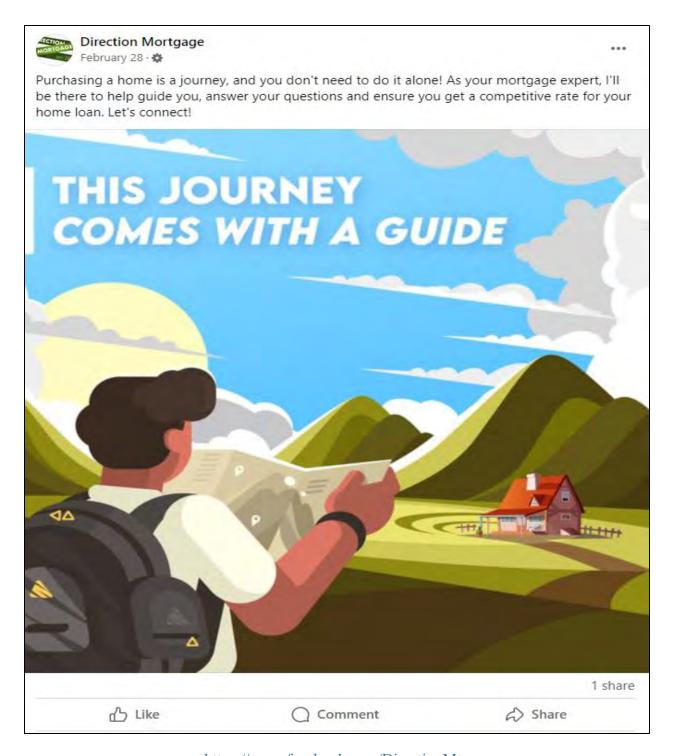
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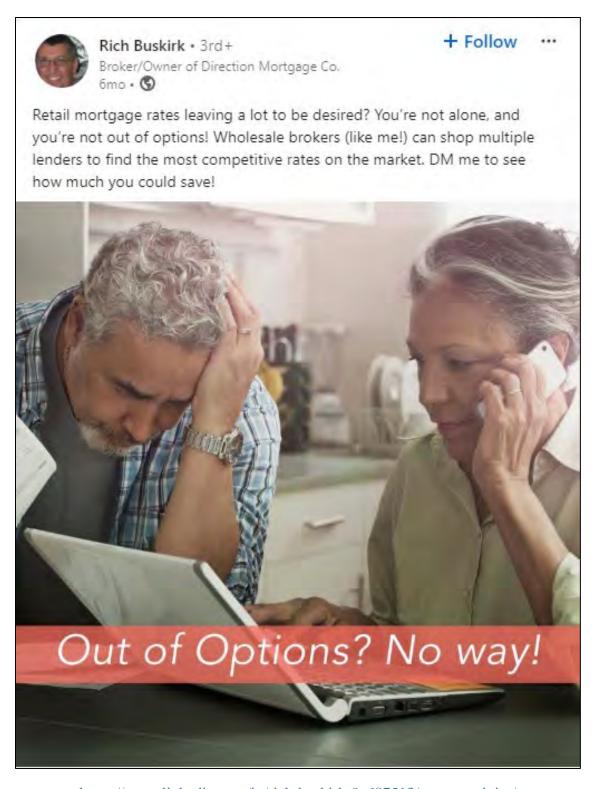
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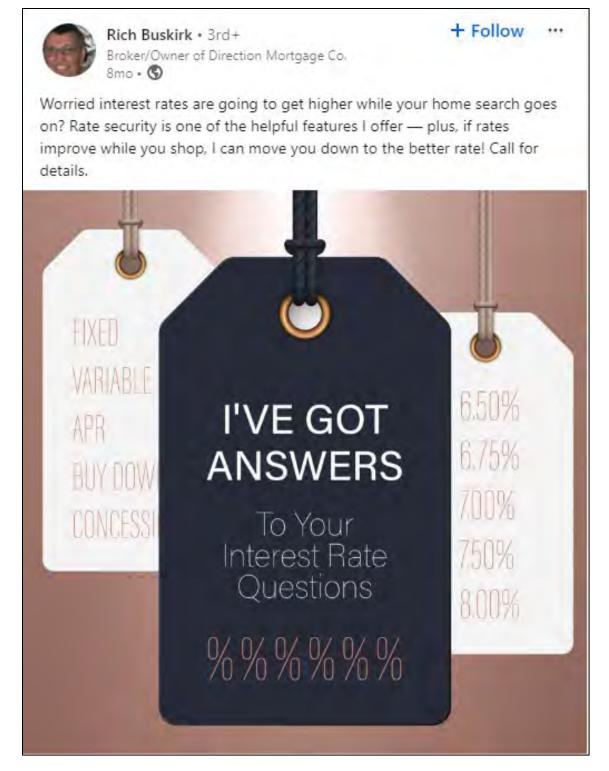
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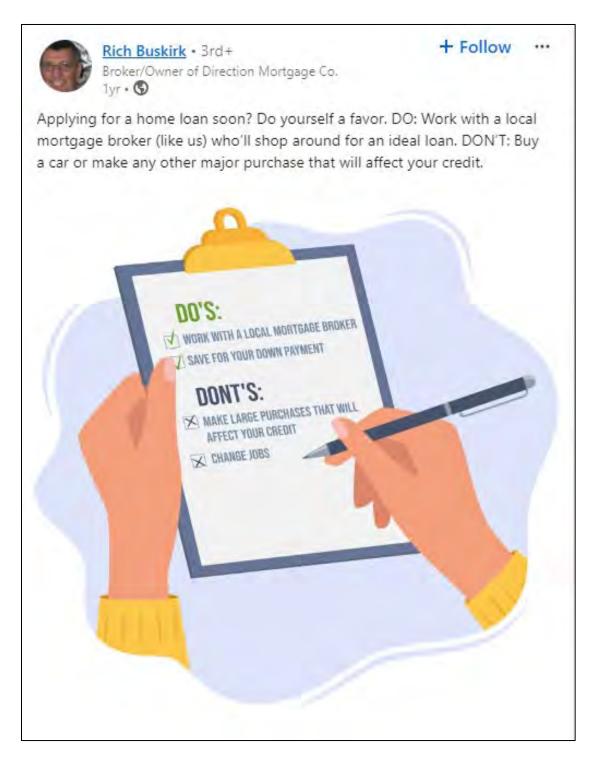


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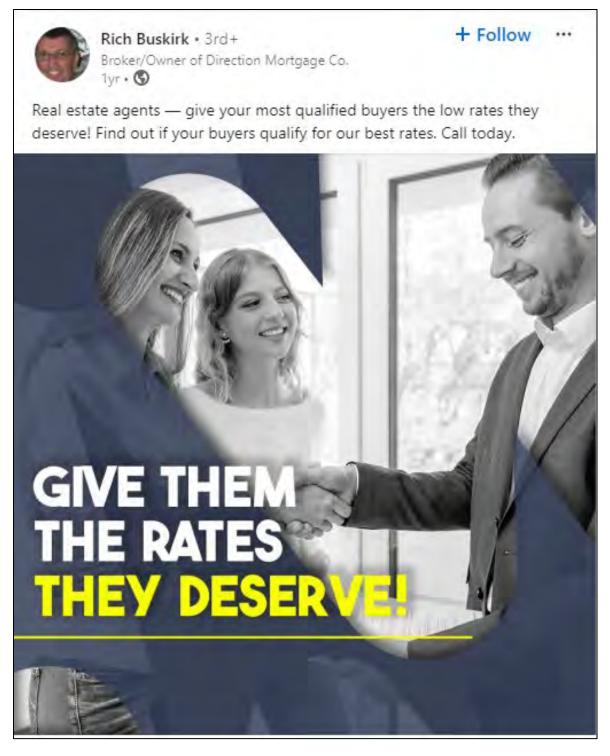
Shopping for a loan should be as simple as finding the perfect home. When you work with an independent mortgage broker, you'll discover rates and terms that fit your specific needs. See for yourself just how rewarding it can be by giving us a call today.



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Looking for loan options for a manufactured home? From conventional to FHA, VA and USDA, we can help you get the best rate for your budget. Contact us for more information!



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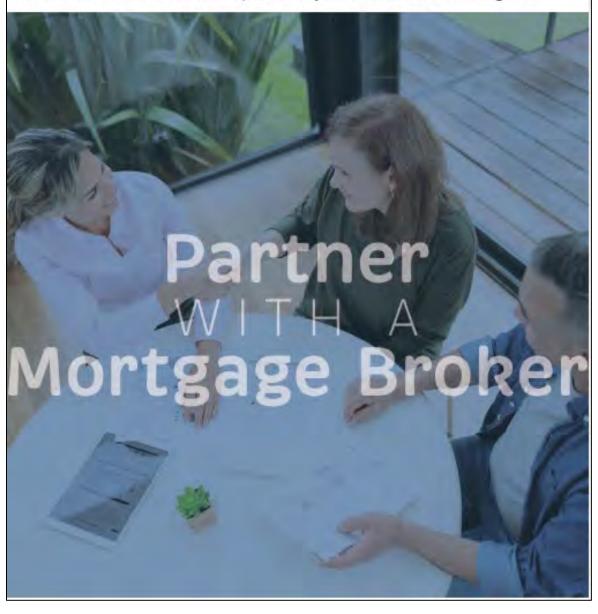


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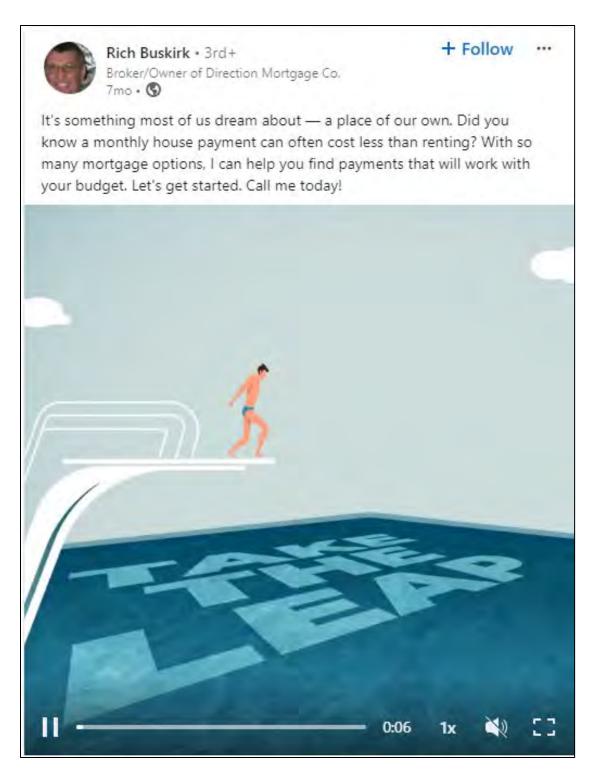
Real estate agents, wondering why you should partner with a broker like me? Big banks and retail lenders have limited loan options. When you use me, I'll find better home loan options for your clients. Let's work together!



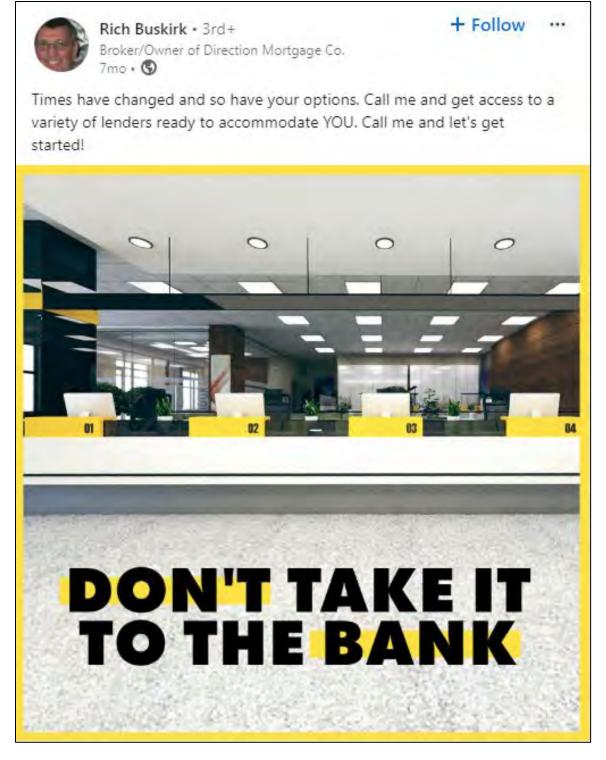
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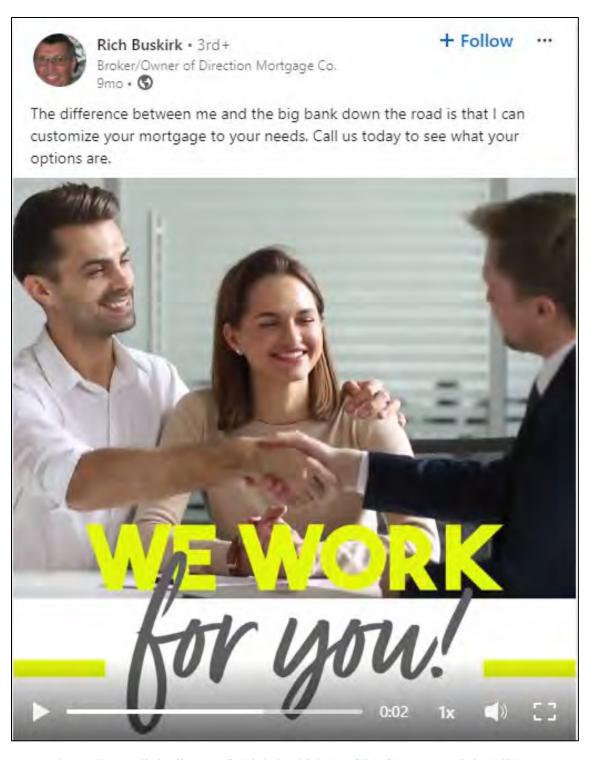


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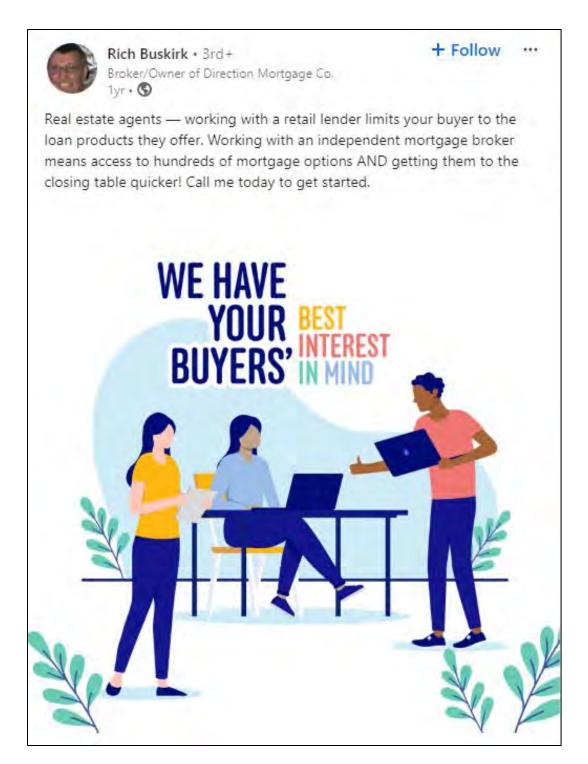


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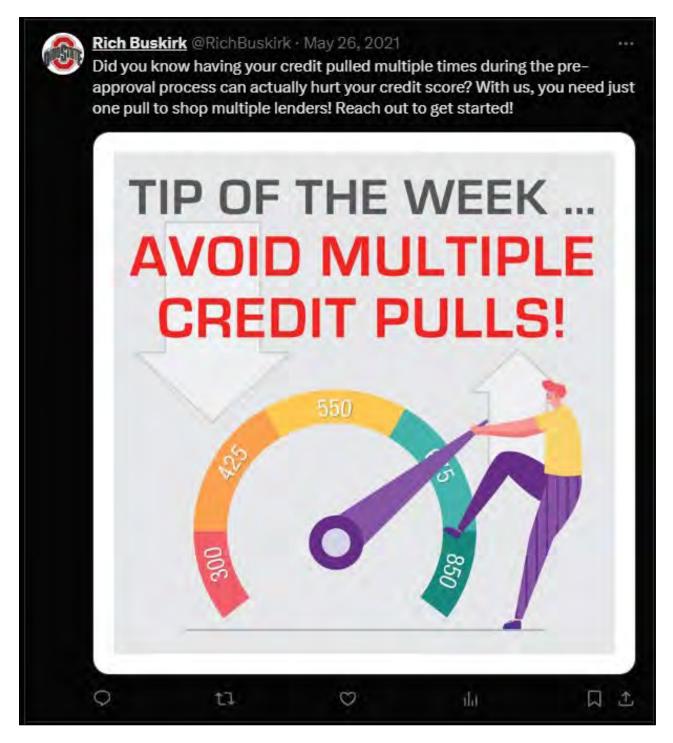
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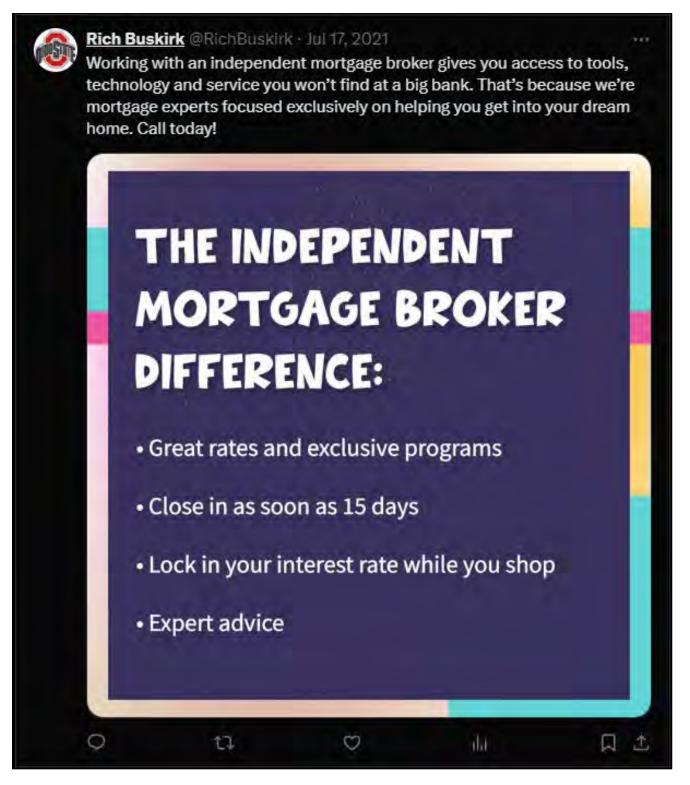
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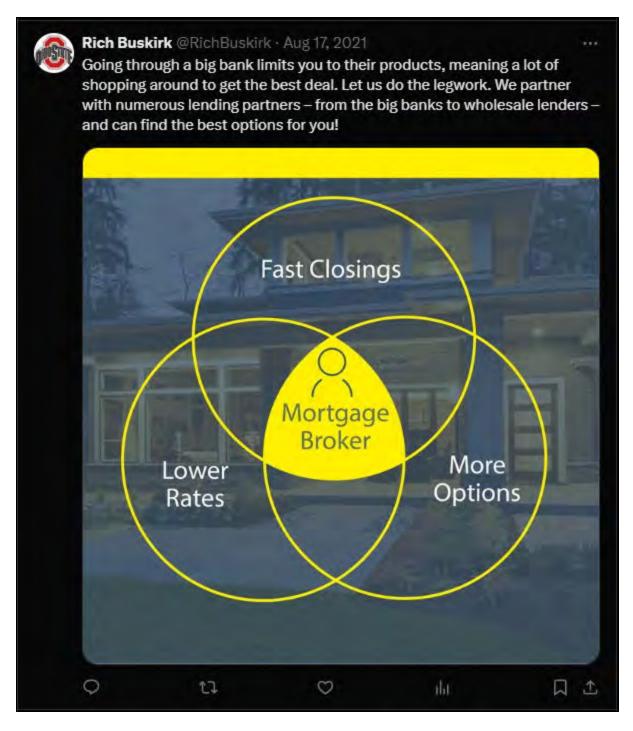
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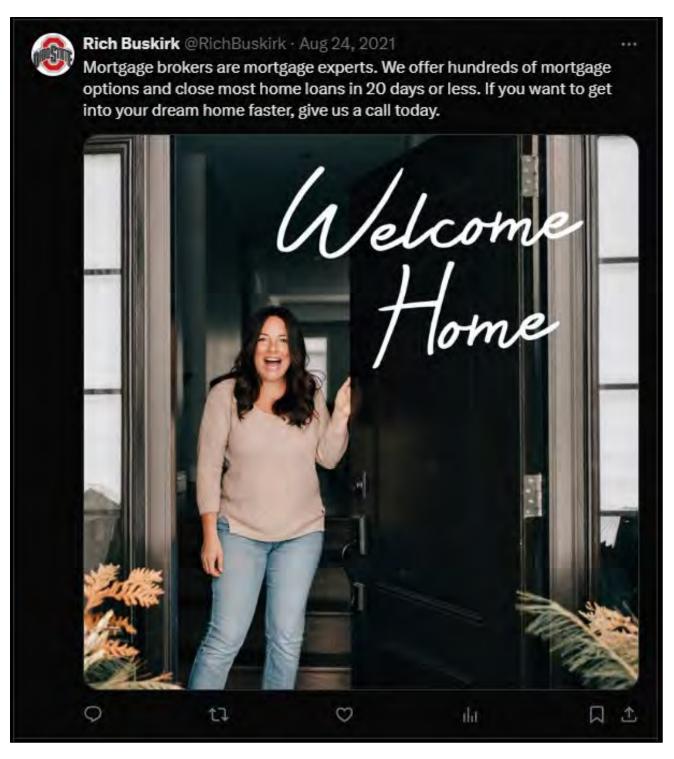
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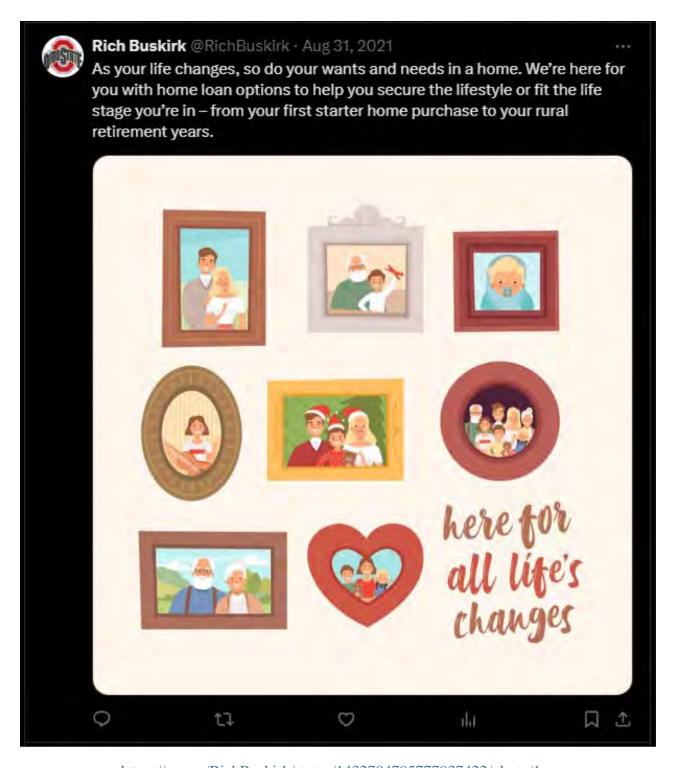
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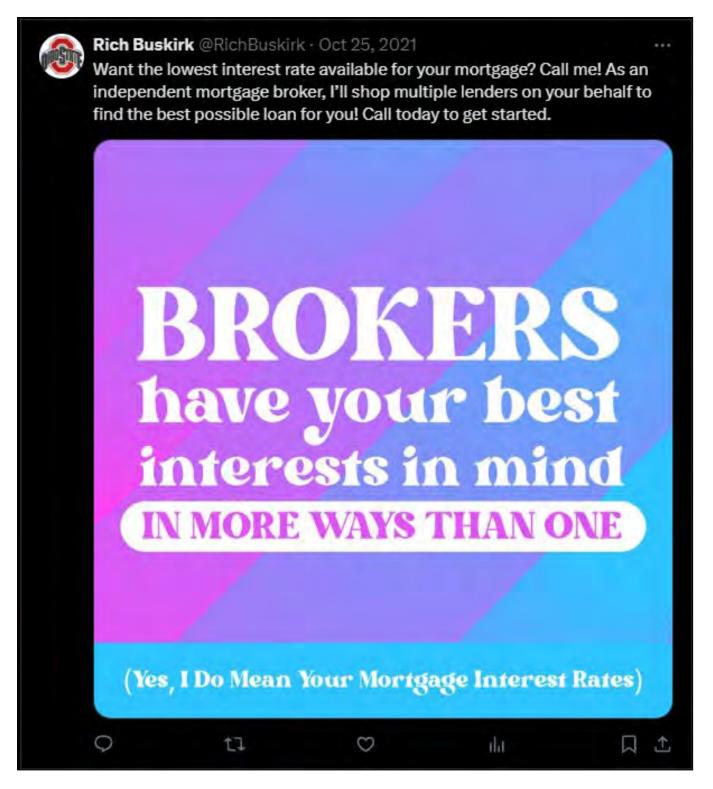
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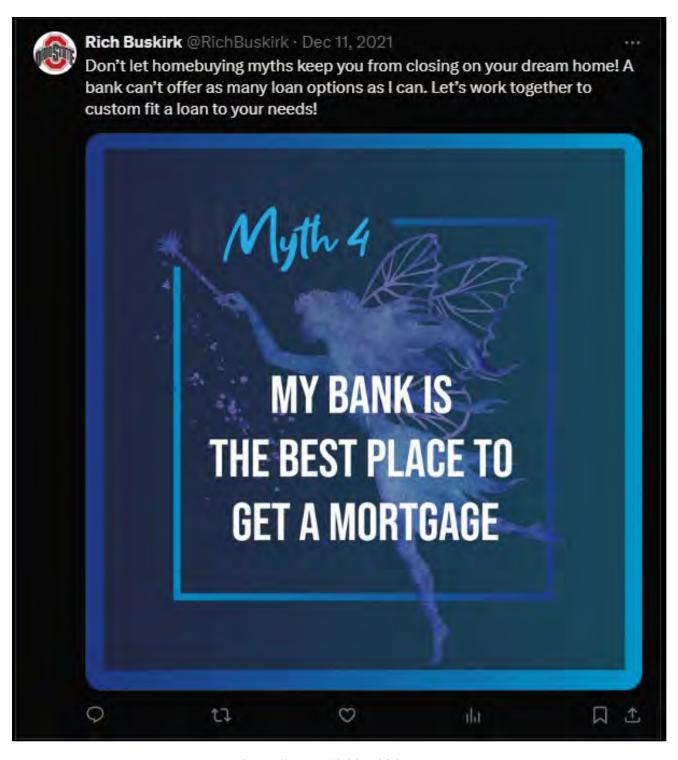
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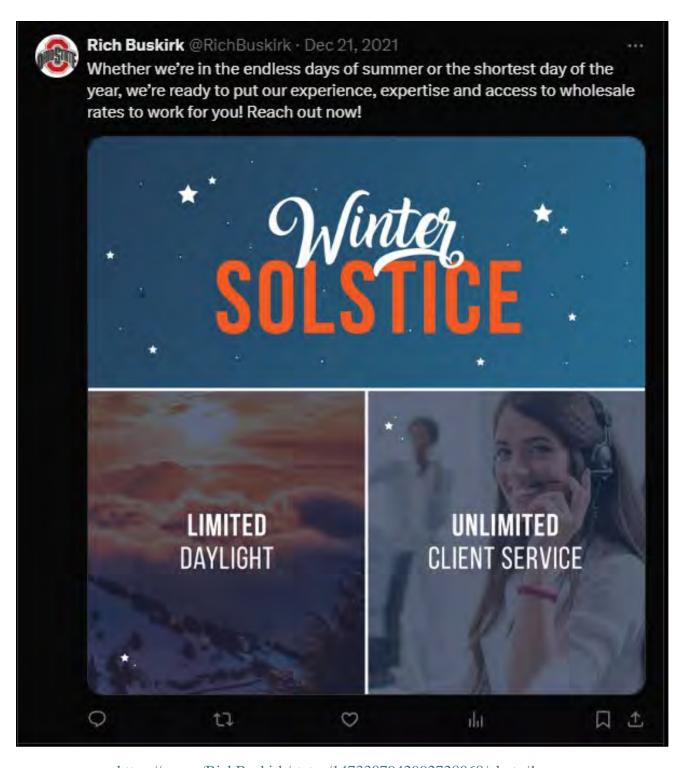
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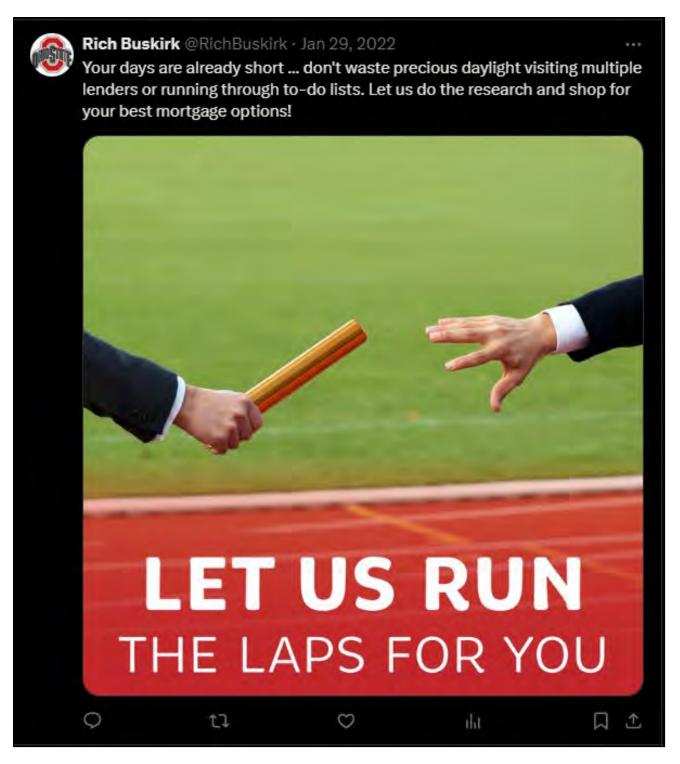
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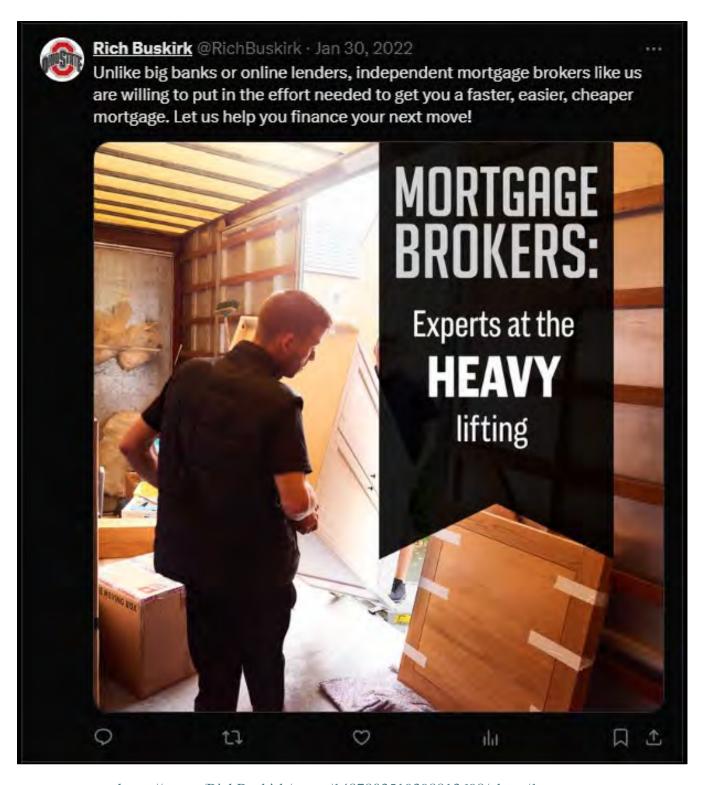
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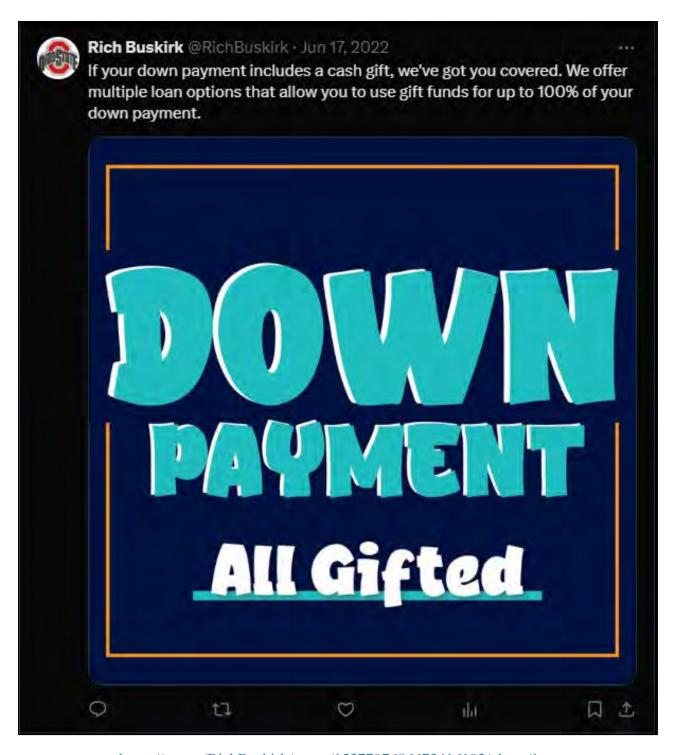
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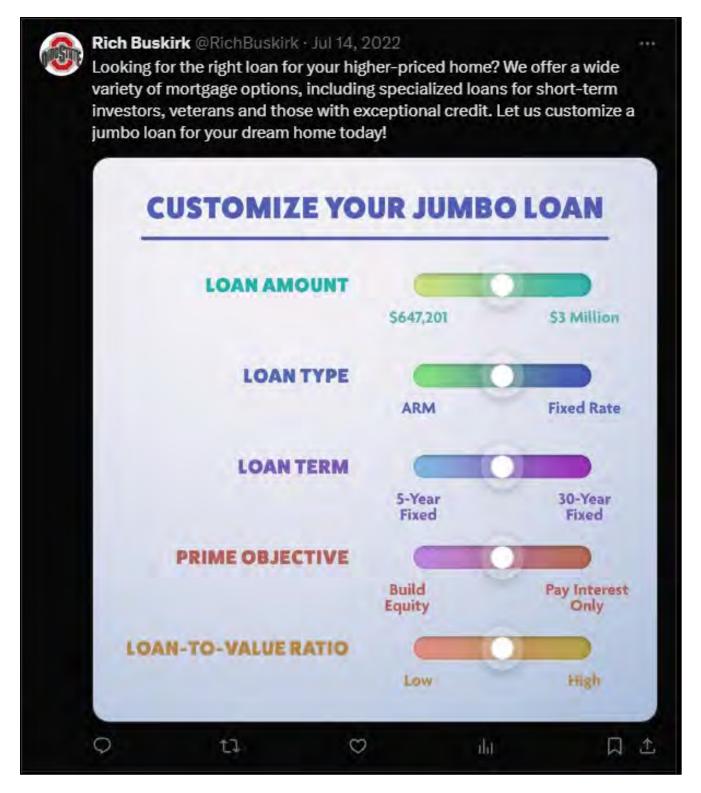
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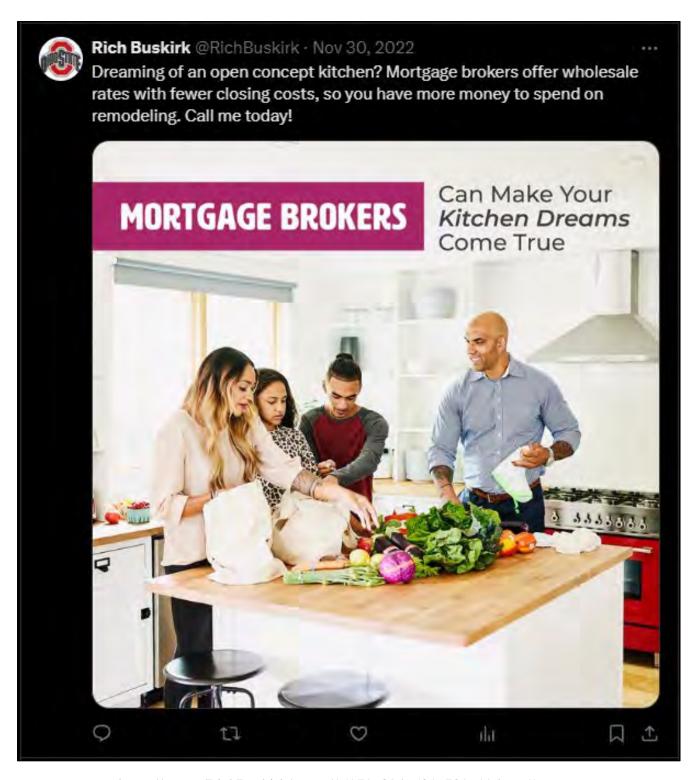
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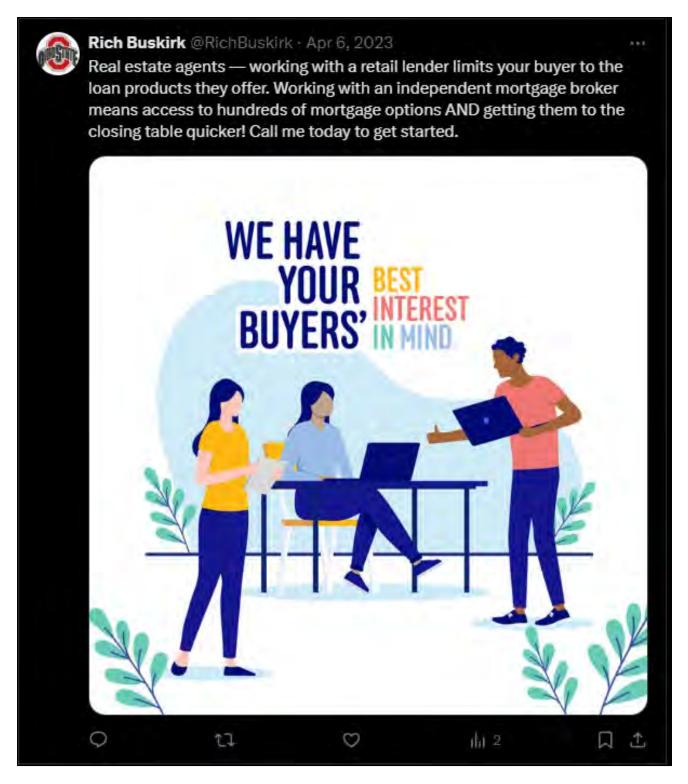
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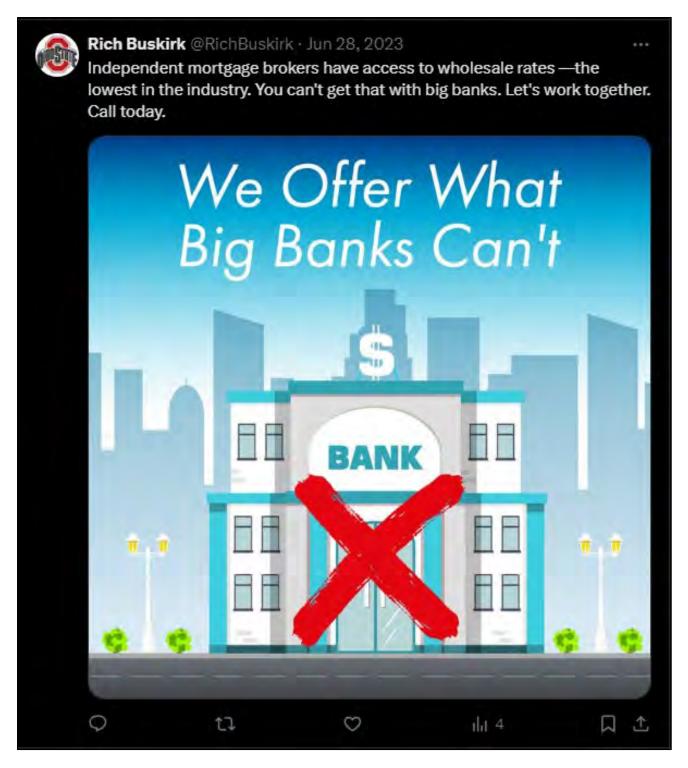
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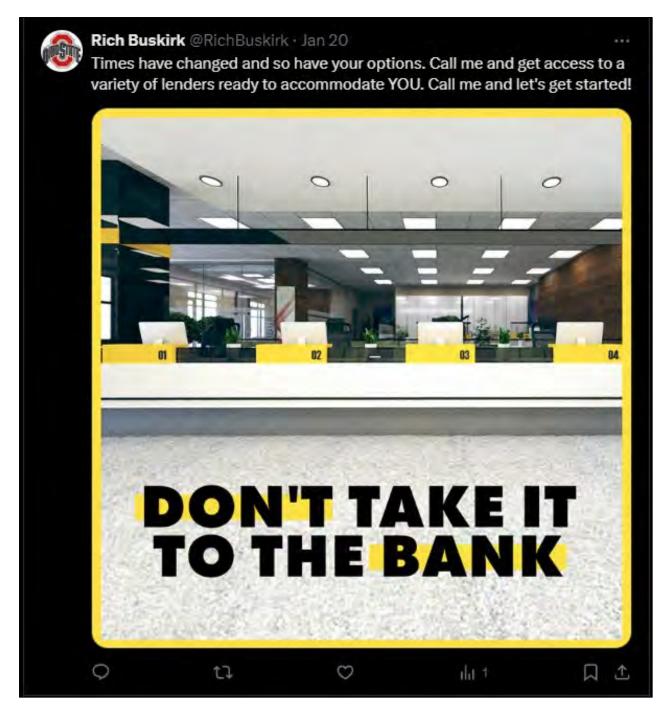
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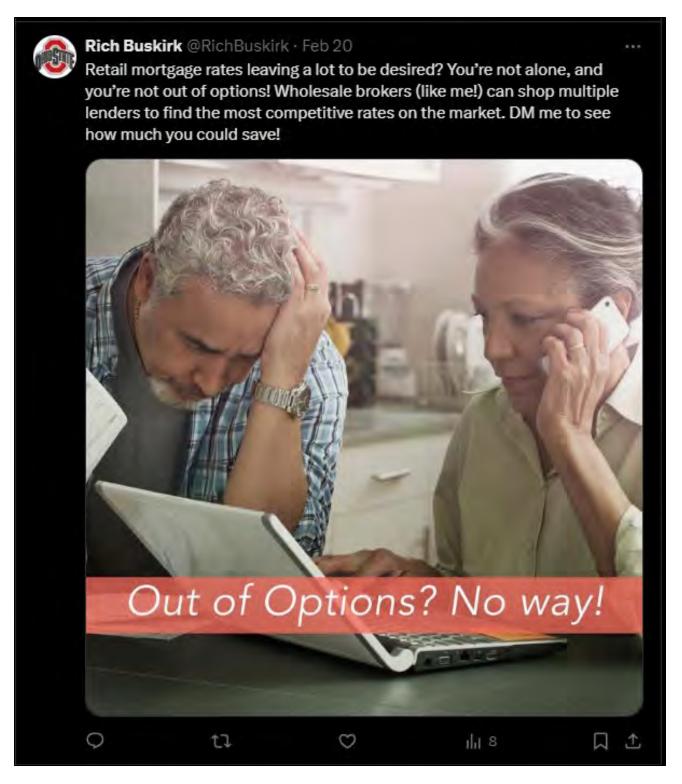
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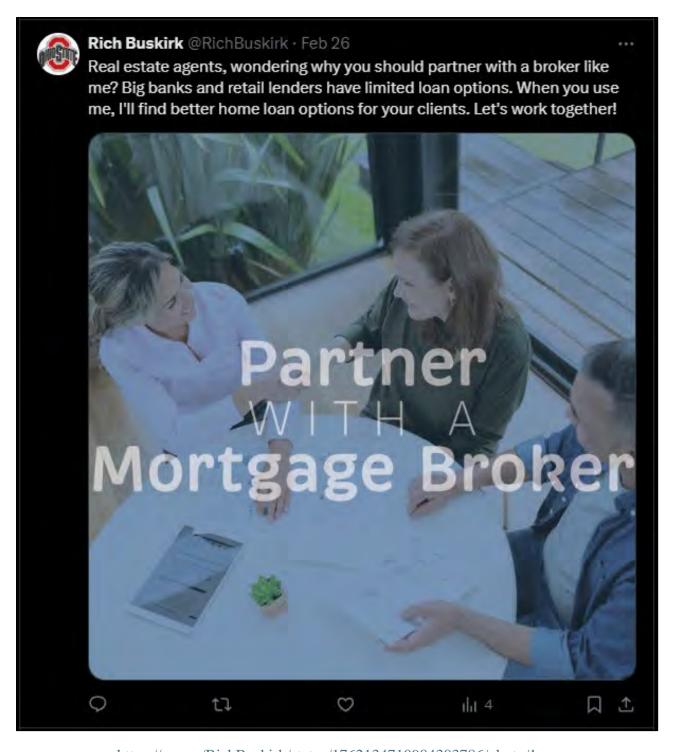
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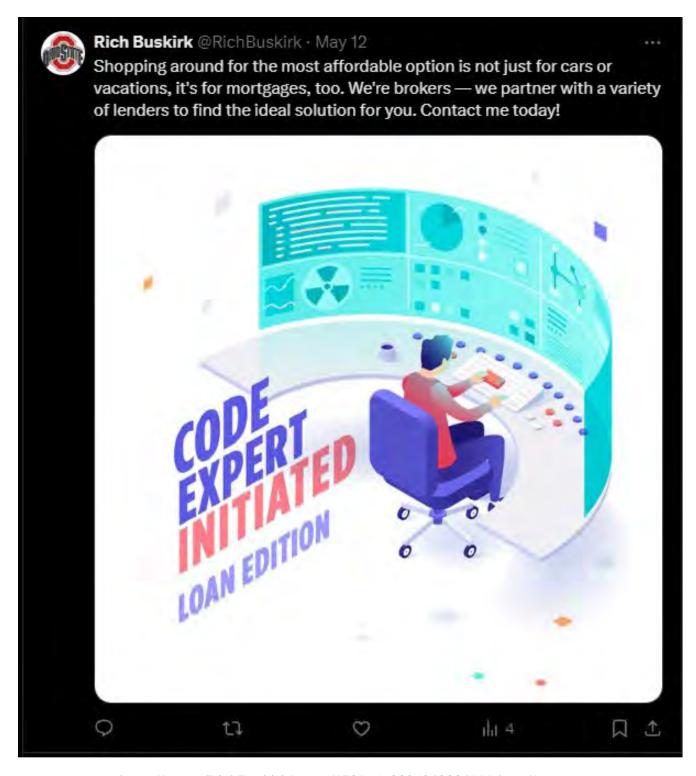
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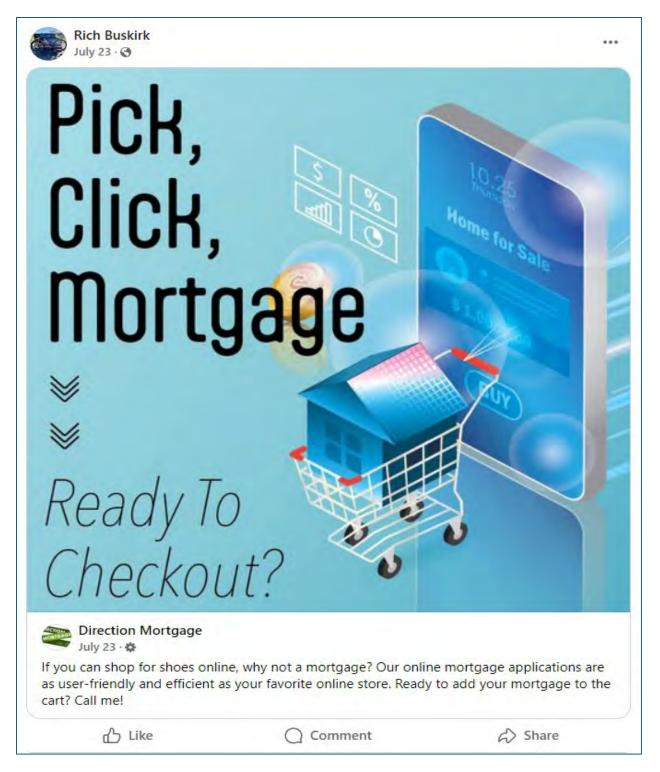
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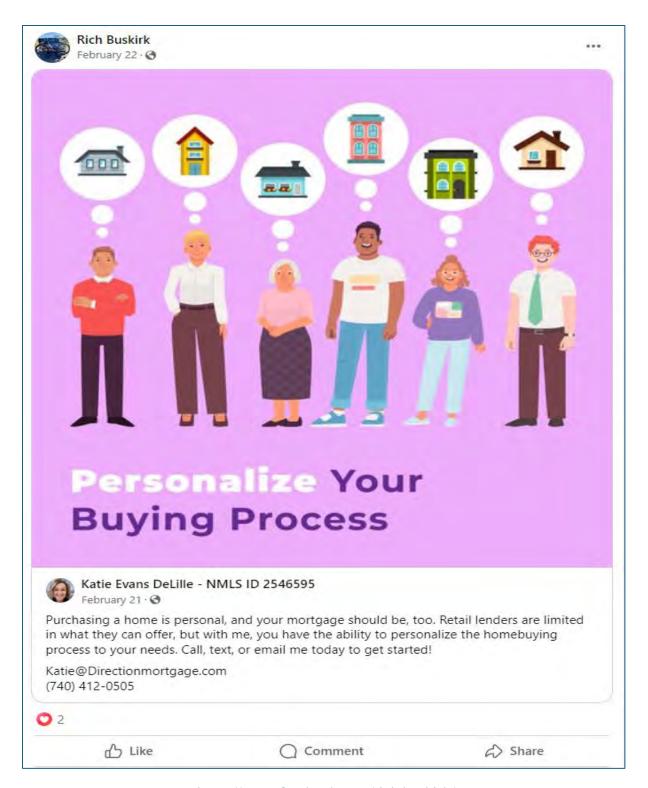
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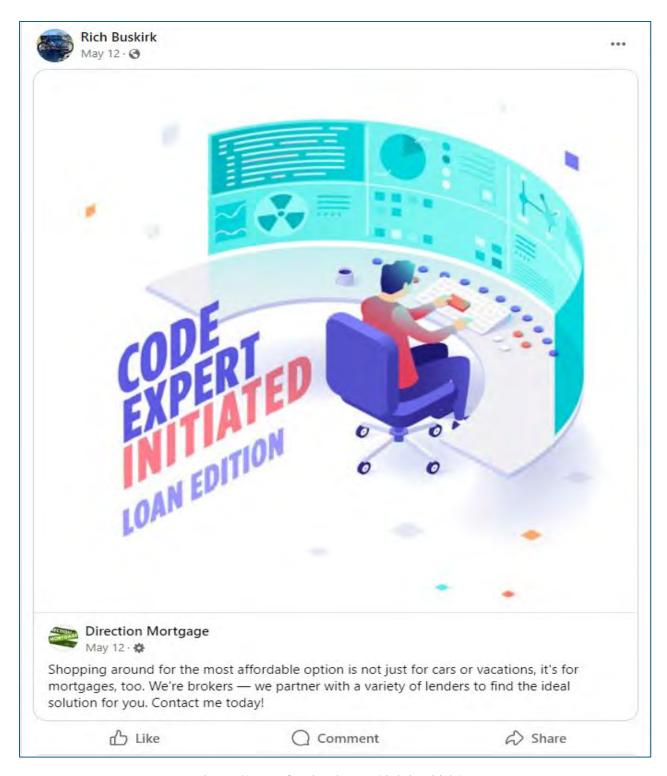




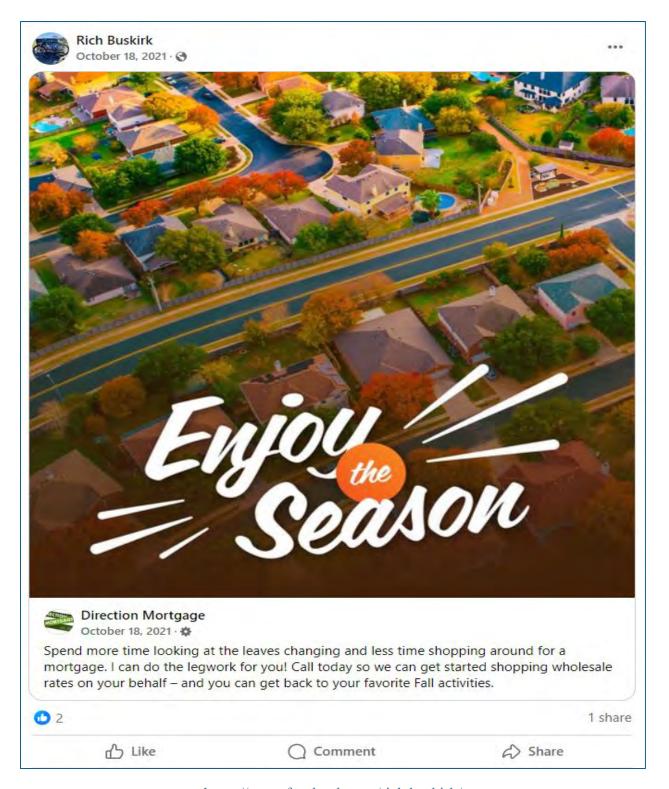








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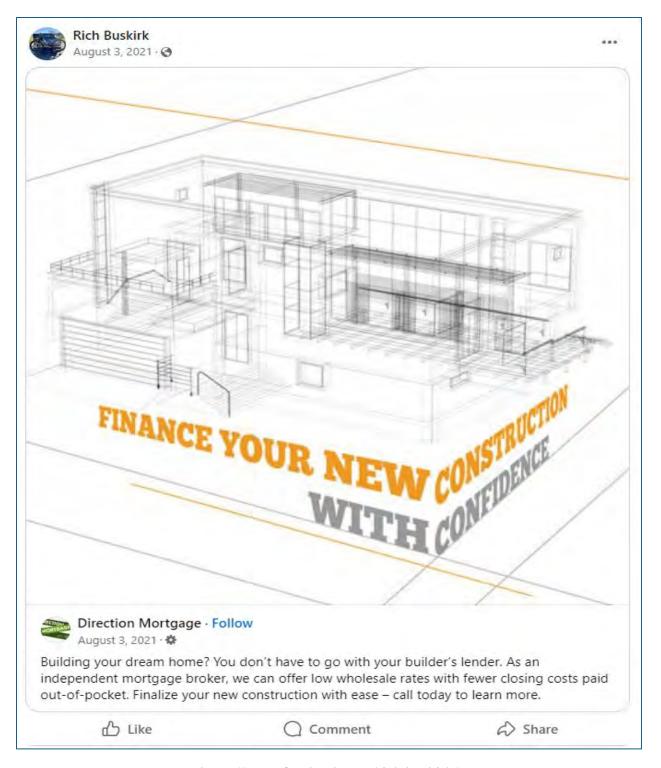
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CLIENTS PROMISE

Our primary responsibilities are to preserve our clients' financial values and to help them achieve their financial goals. We exercise careful diligence to ensure that they enjoy the benefits of the most knowledgeable resources in all areas of their financial management.

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https://www.mottomortgage.com/offices/unlimited-tiffin/



Why Motto Mortgage?

You want local mortgage loan shopping. And that's just what we offer... but better. How, you ask? When you work with Motto, you get a neighborhood mortgage professional at a locally-owned office — plus the power of a national network.





Real people who really care.

The standard mortgage experience can be impersonal. Good thing we're not your grandma's stuffy mortgage company (or your college roommate's online lending giant). The mortgage professionals in your local Motto office have more time to advocate for you, answer all your questions, and be there for every step of the process — and beyond. Why? Because our national support team takes care of those mundane little tasks that usually take up other mortgage professionals' time. And most importantly, our home loan shoppers just really care.

Next >

But wait. There's more to Motto Mortgage.

Sure, our super competitive interest rates, stellar customer service, and easier application process are our hallmarks. But we have a few other tricks up our sleeve.

Many Motto offices are **one-stop-home-shops**. That's because they offer both real estate agents and mortgage professionals under one roof. Yup! You can talk house hunting and home loans in one place. And the best part? Your agent and mortgage pro will work so closely together that you might not even realize where one ends and the other begins — and that's a beautiful thing. Already have a real estate agent? Our mortgage professionals love working with new people too.

Oh, and we're also philanthropic. Remember that "local heart" we talked about? It's something we take seriously and it's why we started the Motto Mortgage Mission Against Hunger. Our network offices work to gather food and monetary donations for their neighborhood food banks and pantries... because community needs go far beyond housing.





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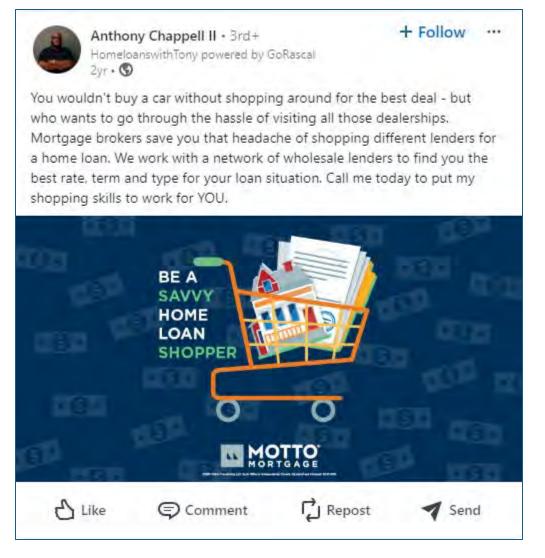
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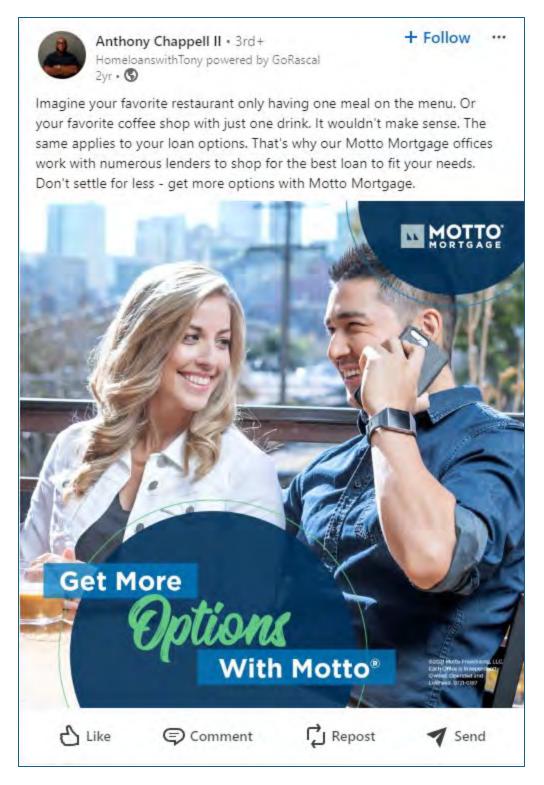
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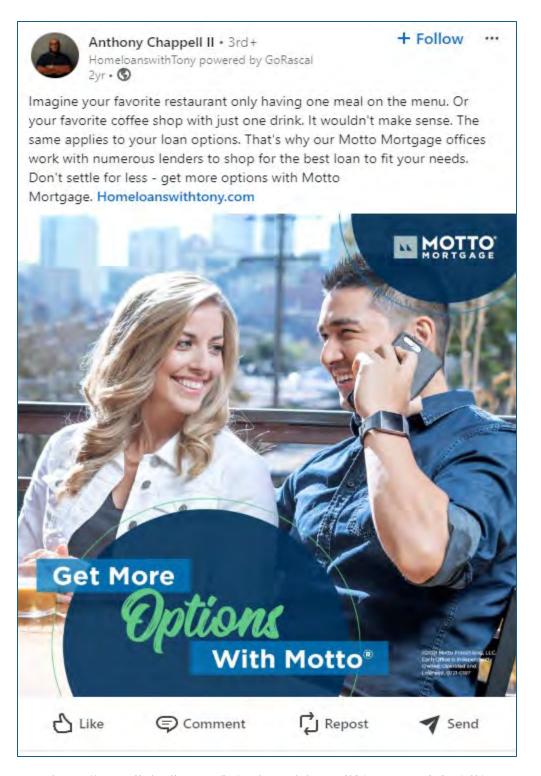
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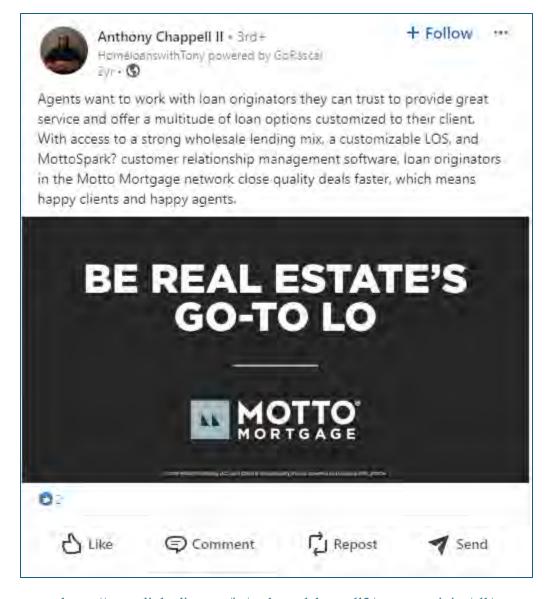
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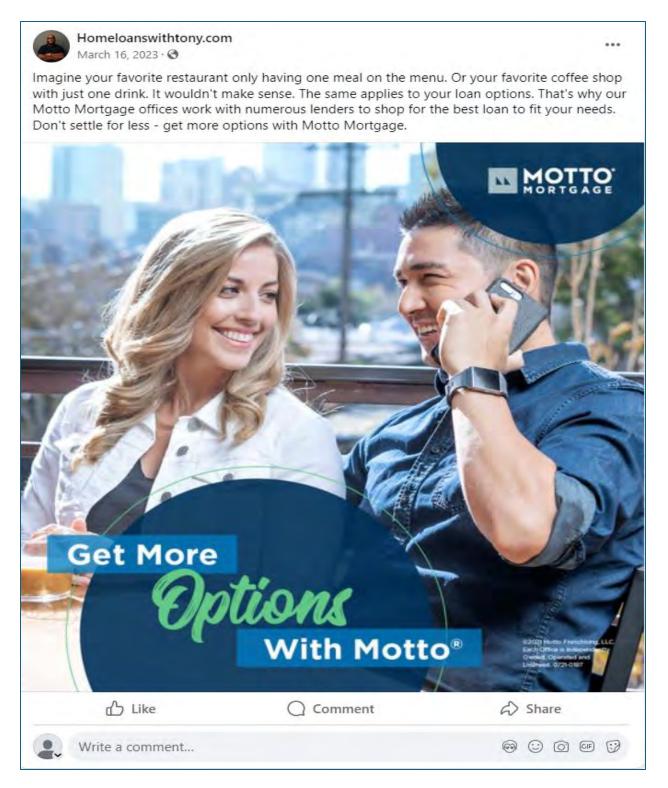
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Who We Are

Let's face it...nothing about home mortgages is simple - until you have someone on your side who understands the process inside and out. Here at Neighborhood Lender we take what is typically an overwhelming and complex process, and transform it into an easy, straightforward (and dare we say... enjoyable) experience.

How do we do it? By hiring world-class mortgage consultants who train rigorously all year long. These people are serious about saving you money, frustration and painful head banging. We focus on sound underwriting principles, and dedicate ourselves to working with only the most qualified borrowers. And because of all that, we've been able to save clients more than \$5 million in closing costs - now that's a lot of extra cash!

Our Approach

Closing costs average \$3,350, and that hefty sum typically comes straight from your pocket. We don't really think that's fair, which is why we decided to start doing things a little differently. In fact, we pay your closing costs (go ahead and read that line again...it's for real). So whether you're financing your primary residence, a vacation home, or an investment property, the closing costs are on us. Wondering how we do that? It's simple - we leverage the relationships we've built with our lending partners, and we take the time to think just a little bit outside the box.

Our Service Locations

Neighborhood Lender works with residents in North Carolina, South Carolina, Virginia, Maryland, Tennesee and Ohio for all their home mortgage and home refinancing needs. If you live — or plan to live — in one of these states, we would love to talk to you. We promise it won't be painful—we just want to see how we can help.

OUR LICENSES

Maryland Commissioner of Financial Regulation License #20076

North Carolina Commissioner of Banks License #B-141368

Ohio Department of Commerce Division of Financial Institutions #MB.804099.000

South Carolina Commissioner of Banking License #MB-0915500-0915501

Tennessee Department of Financial Institutions #69349

Virginia Bureau of Financial Institutions #MC-5553

NMLS Broker #69349

https://www.neighborhoodlender.com/about-us



https://www.instagram.com/p/CorxVyNjbj2/

expert help

Our experienced loan consultants will take the time to understand your needs and help find the perfect mortgage for you.

CHAT WITH AN EXPERT

https://loanpronto.com/

ABOUT LOAN PRONTO

less is so much more

Loan Pronto has developed a digital mortgage process that streamlines your experience, thus saving you time, money, and a lot of paper.

(view service locations

simple is so much better

IT'S NOT A SECRET THAT MOST PEOPLE WOULD DESCRIBE THEIR MORTGAGE EXPERIENCE AS A NEVER-ENDING CYCLE OF CONFUSION, ANXIETY, AND SCANNER TROUBLES. THE REAL SECRET IS THAT IT DOESN'T HAVE TO BE THAT WAY.

We started Loan Pronto because we wanted to make refinancing or purchasing your home as easy as it should be. By leveraging the speed and efficiency of digital platforms, we make getting a loan faster, less expensive and less invasive, without sacrificing the personal service that helps put your concerns at ease. Basically, we make it simple because it should be.

who we are

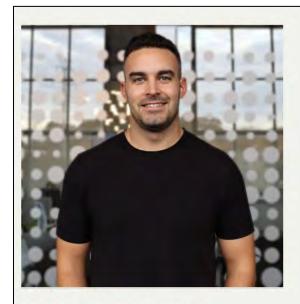
AS LENDING PROFESSIONALS WITH YEARS OF EXPERIENCE, WE GOTTIRED OF SEEING SO MANY WELL-QUALIFIED BORROWERS BE SHUT OUT OF THE MARKET BY A PROCESS THAT WAS UNNECESSARILY COMPLICATED.

So, we decided to take our expertise and match it with the latest in online tools and automation. We wanted to finally deliver a mortgage process that didn't leave qualified candidates scrambling to get to the finish line

The result is an easy-to-use digital platform that can get your mortgage needs handled faster with fewer expenses, allowing us to offer the lowest rates and fees in the industry.

DRIVEN AND COMPETITIVE We do what it takes to become world-class, and we use those skills to compete against and beat the competition. ENTREPRENEURIAL We are innovative, we believe every problem has a solution, and we never do anything because it has always been done that way. HONEST AND ETHICAL We do what is right even when nobody is watching. RESOURCEFUL We believe in working smarter, not harder, and we use all tools at our disposal to find the out-of-the-box solution. EVERY CUSTOMER, EVERY TIME Relationships are the lifeblood of our business, and we place focus on our client's needs. HAVE FUN We believe that if we have fun, our customers will tool





SENIOR LOAN OFFICER

zack neumeister

nmls #1669560

Licensed In: California, Florida, Georgia, Illinois, Indiana, Kentucky, Maryland, North Carolina, Ohio, Pennsylvania, South Carolina, Tennessee, Texas, Virginia

Background:

Zack grew up in Westminster, MD, and graduated from Greensboro College in 2017 with a BS in Business & Economics. He started in the mortgage industry in 2017 and is experienced with helping families save as much money as possible on their debts as well as making home purchases in the most cost-effective way.

https://loanpronto.com/our-team/

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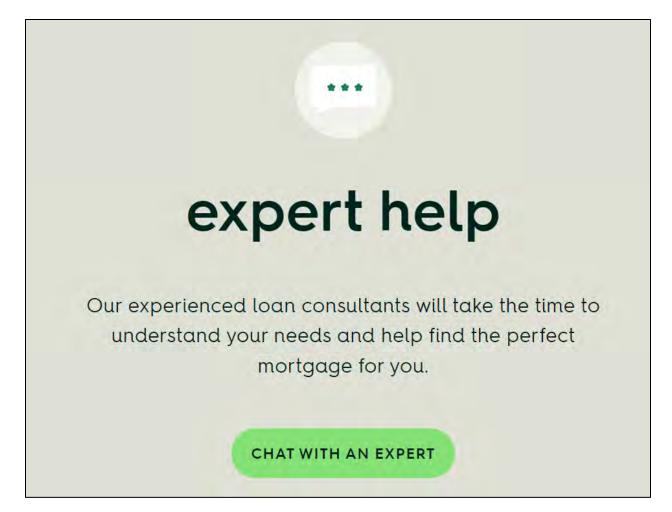


expert help

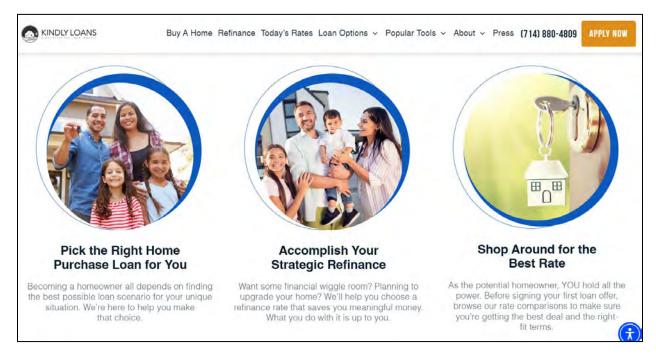
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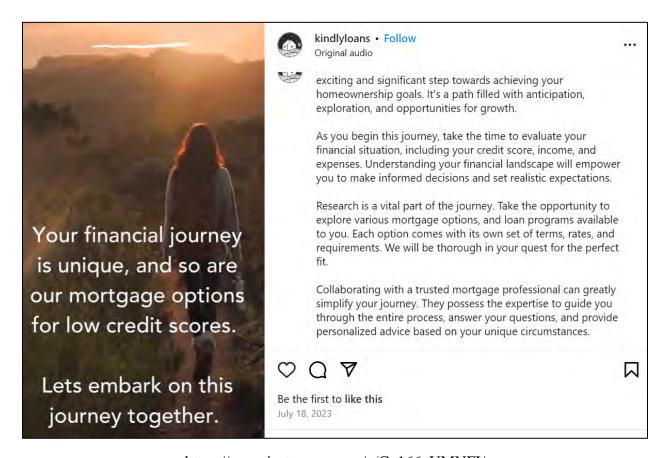
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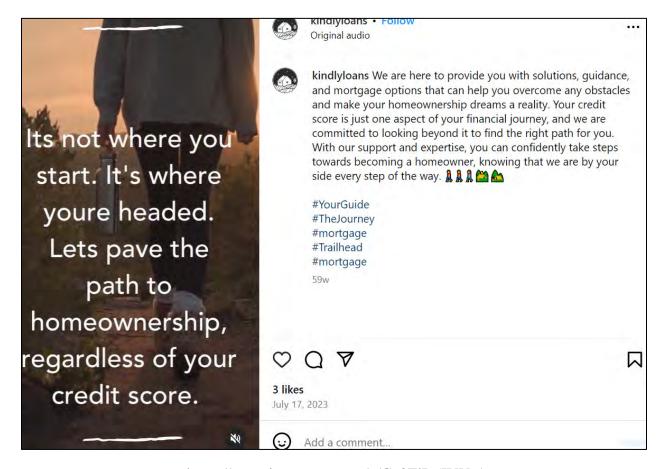
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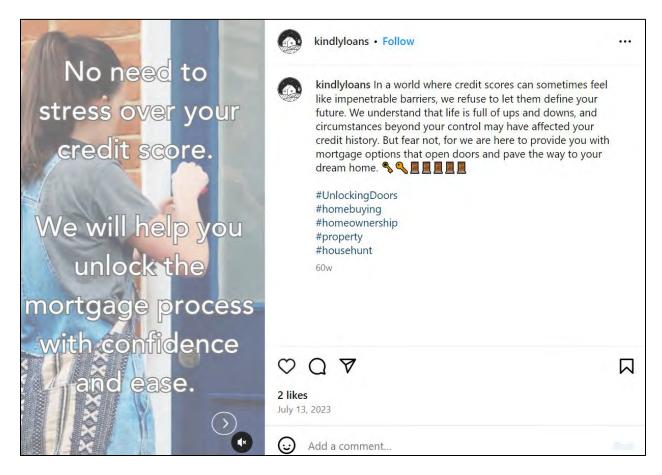
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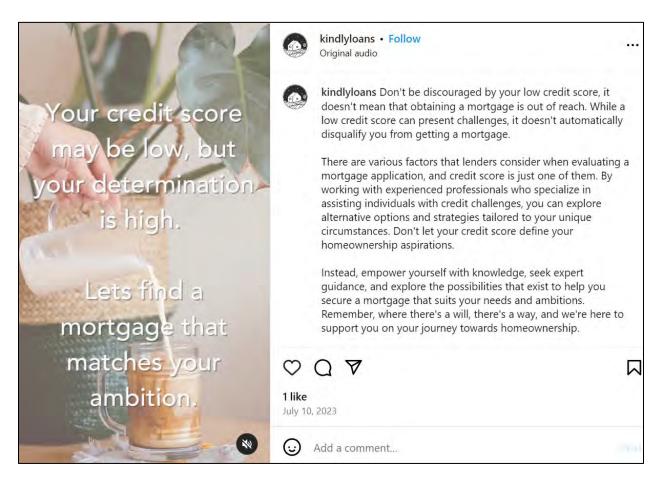
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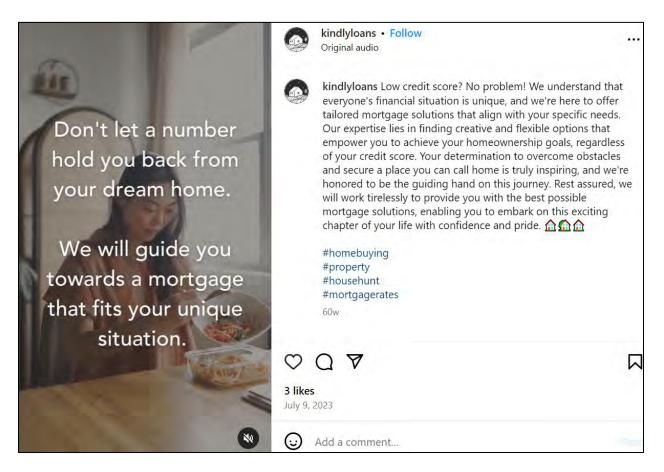
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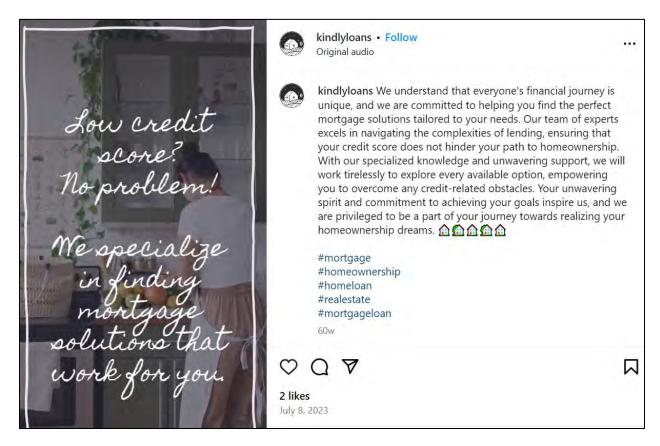
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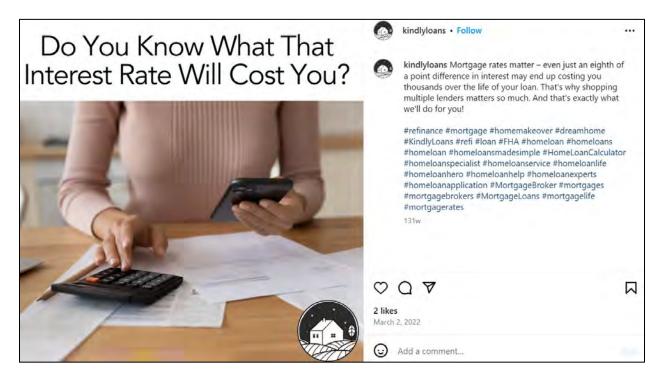
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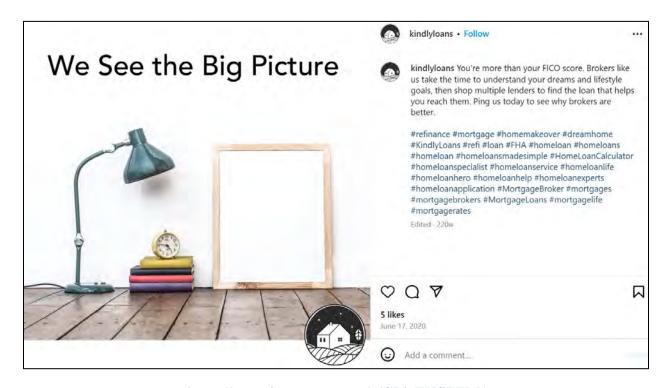
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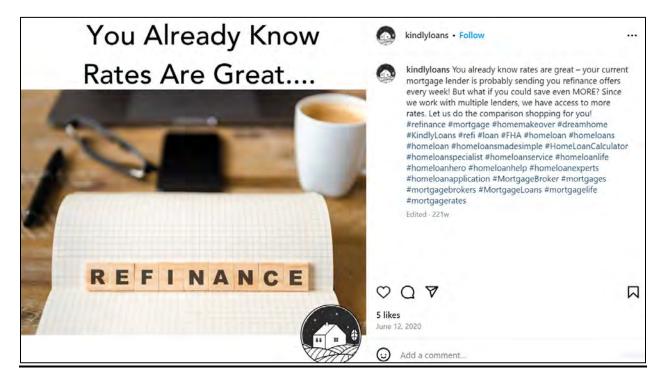
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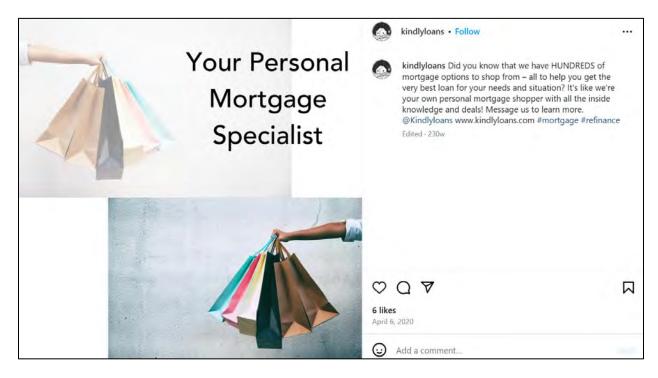
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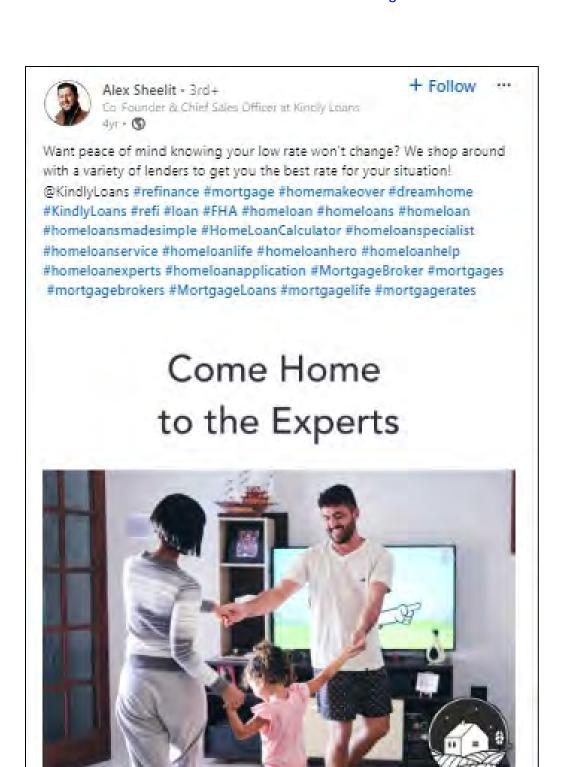


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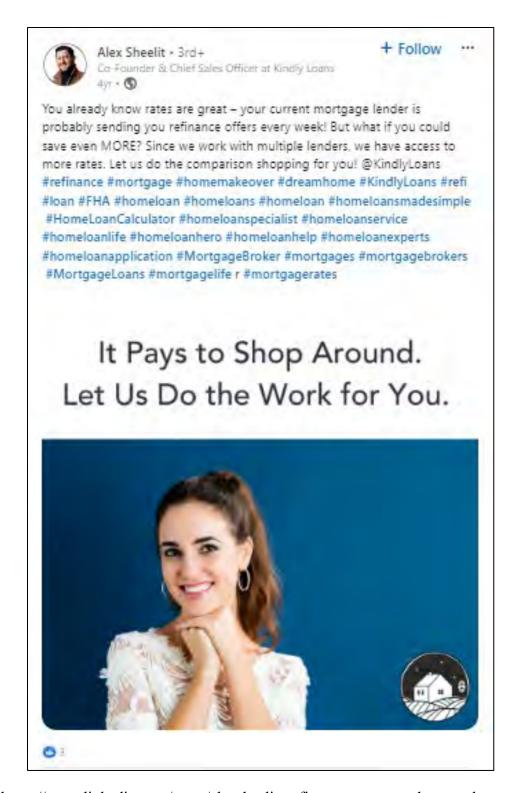
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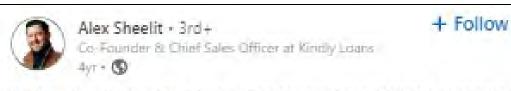
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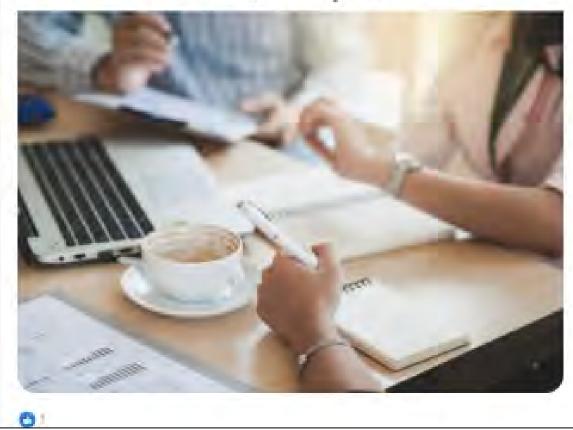


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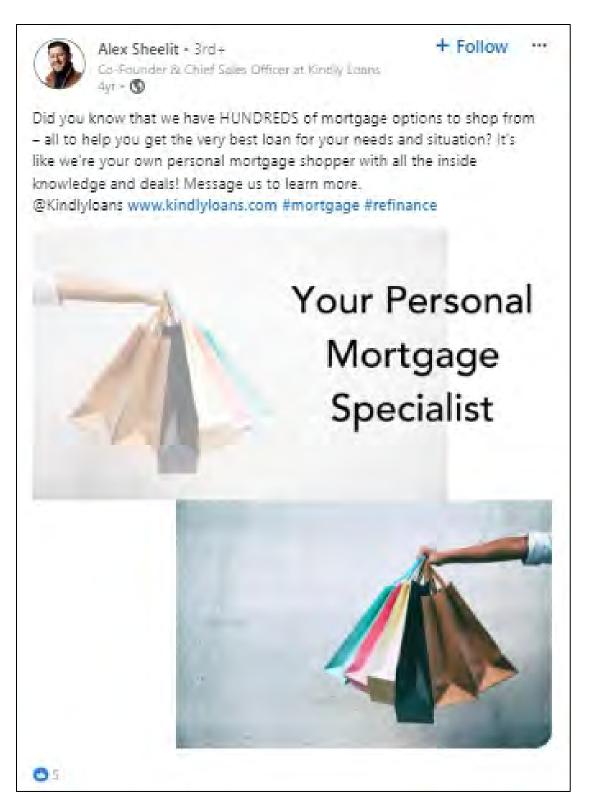


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less is so much more

Loan Pronto has developed a digital mortgage process that streamlines your experience, thus saving you time, money, and a lot of paper.

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IT'S NOT A SECRET THAT MOST PEOPLE WOULD DESCRIBE THEIR MORTGAGE EXPERIENCE AS A NEVER-ENDING CYCLE OF CONFUSION, ANXIETY, AND SCANNER TROUBLES. THE REAL SECRET IS THAT IT DOESN'T HAVE TO BE THAT WAY.

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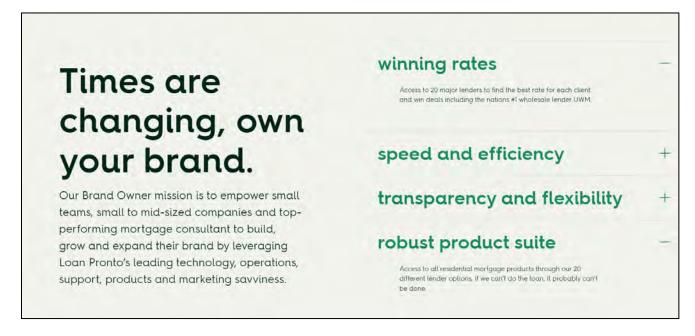
who we are

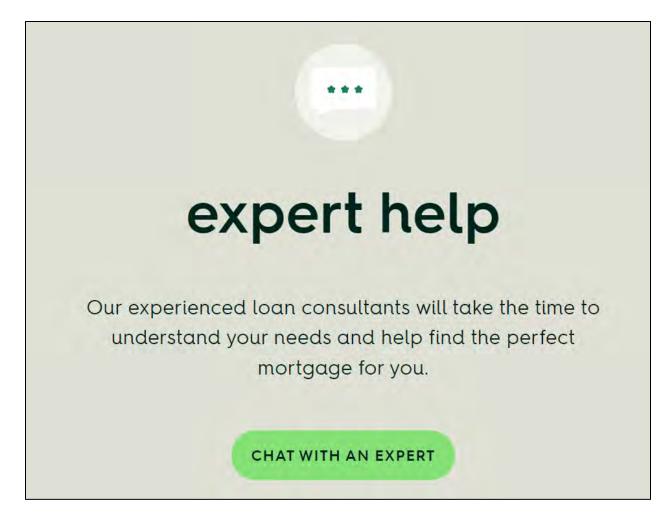
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DRIVEN AND COMPETITIVE We do what it takes to become world-class, and we use those skills to compete against and beat the competition. ENTREPRENEURIAL We are innovative, we believe every problem has a solution, and we never do anything because it has always been done that way. HONEST AND ETHICAL We do what is right even when nobody is watching. RESOURCEFUL We believe in working smarter, not harder, and we use all tools at our disposal to find the out-of-the-box solution. EVERY CUSTOMER, EVERY TIME Relationships are the lifeblood of our business, and we place focus on our client's needs. HAVE FUN We believe that if we have fun, our customers will tool





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Ready to Talk?

Are you unsure on the path you should take to home ownership? Our Loan Specialists are here to help you through the entire process. They will find you the best term, and rate to fit your budget!

GET STARTED NOW!

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At Entrust Mortgage, LLC, we treat each customer as an individual, not a number. We don't place you into a loan profile formula created by the banking industry. We use "common sense" and will help you obtain the best loan possible. We represent a wide range of "A" rated lenders with first quality rates to private "hardship" lenders.

We work with more than 100 investors. This allows us to get you the best rates on all types of loan programs including: 30yr mortgage, 20yr mortgage, 15yr mortgage, 10yr mortgage, 19r ARMS, 3yr ARMS, 5yr ARMS, Conventional, Jumbo, Home Equity Lines, VA and Commercial. Whether your situation calls for Full Documents, No Documents, Non-Owner Occupied (Investor) or Multi-Family, we'll fit your needs!

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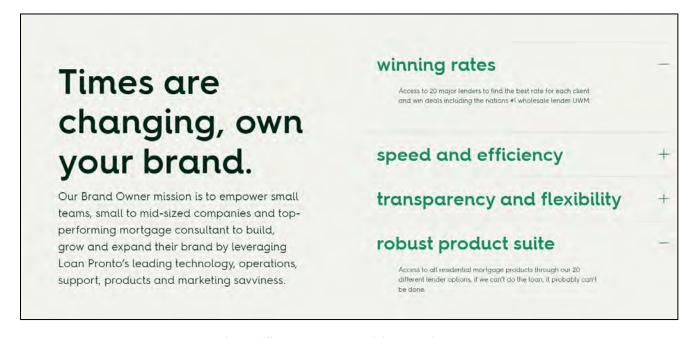
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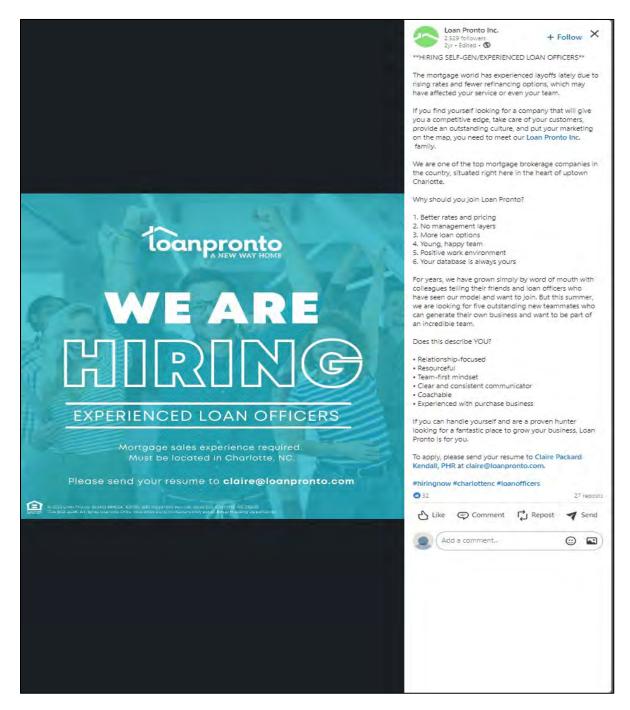


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Who We Are

Let's face it...nothing about home mortgages is simple - until you have someone on your side who understands the process inside and out. Here at Neighborhood Lender we take what is typically an overwhelming and complex process, and transform it into an easy, straightforward (and dare we say... enjoyable) experience.

How do we do it? By hiring world-class mortgage consultants who train rigorously all year long. These people are serious about saving you money, frustration and painful head banging. We focus on sound underwriting principles, and dedicate ourselves to working with only the most qualified borrowers. And because of all that, we've been able to save clients more than \$5 million in closing costs - now that's a lot of extra cash!

Our Approach

Closing costs average \$3,350, and that hefty sum typically comes straight from your pocket. We don't really think that's fair, which is why we decided to start doing things a little differently. In fact, we pay your closing costs (go ahead and read that line again...it's for real). So whether you're financing your primary residence, a vacation home, or an investment property, the closing costs are on us. Wondering how we do that? It's simple - we leverage the relationships we've built with our lending partners, and we take the time to think just a little bit outside the box.

Our Service Locations

Neighborhood Lender works with residents in North Carolina, South Carolina, Virginia, Maryland, Tennesee and Ohio for all their home mortgage and home refinancing needs. If you live — or plan to live — in one of these states, we would love to talk to you. We promise it won't be painful we just want to see how we can help.

OUR LICENSES

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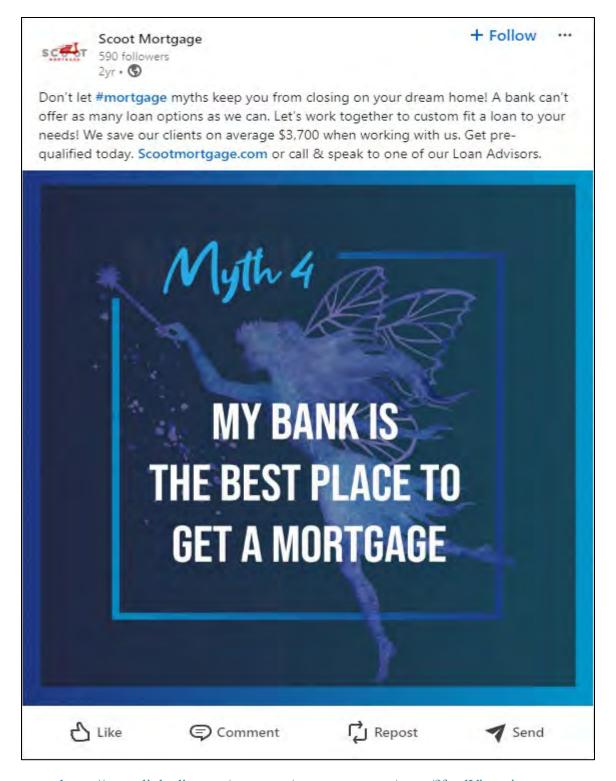
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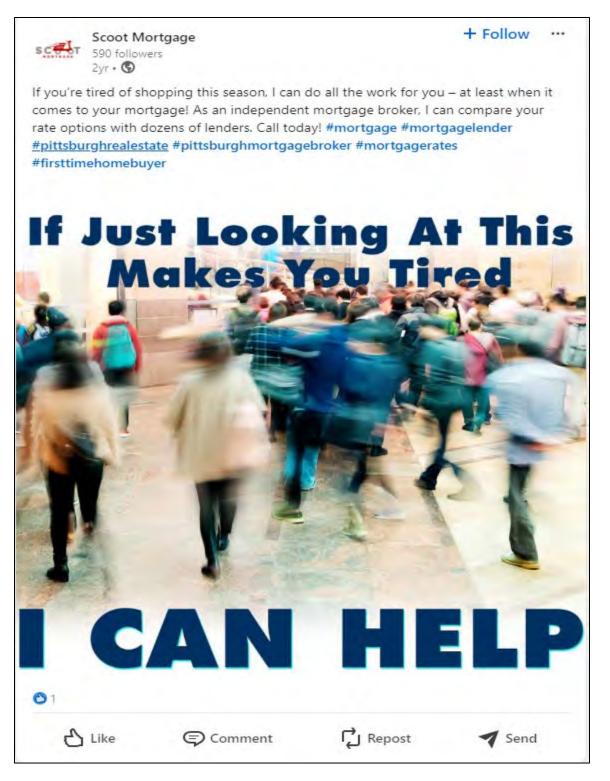
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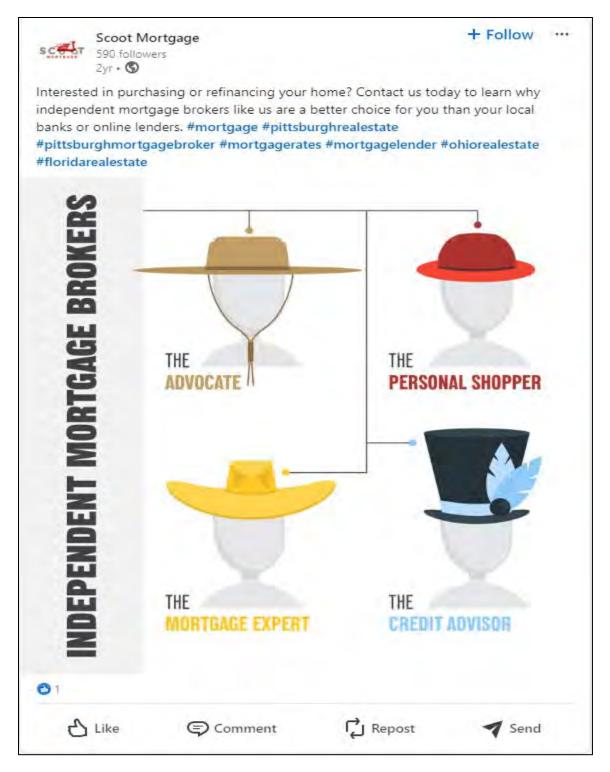
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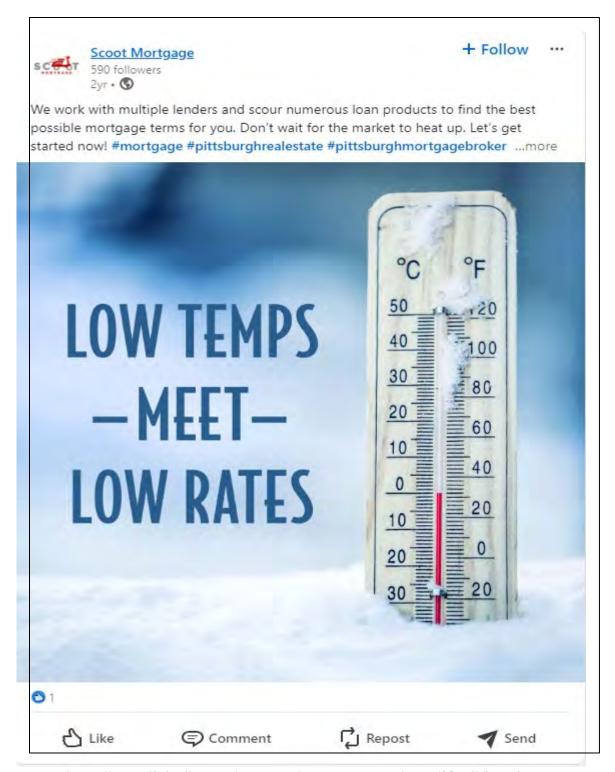
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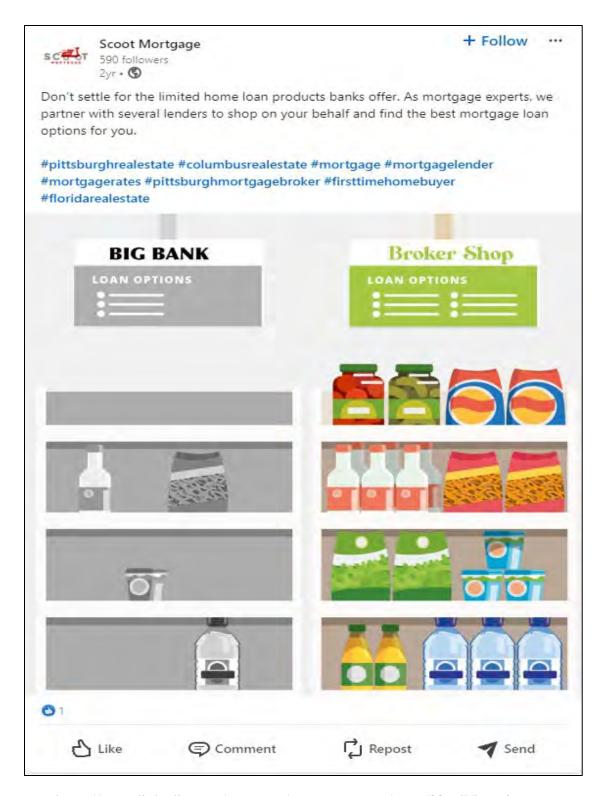
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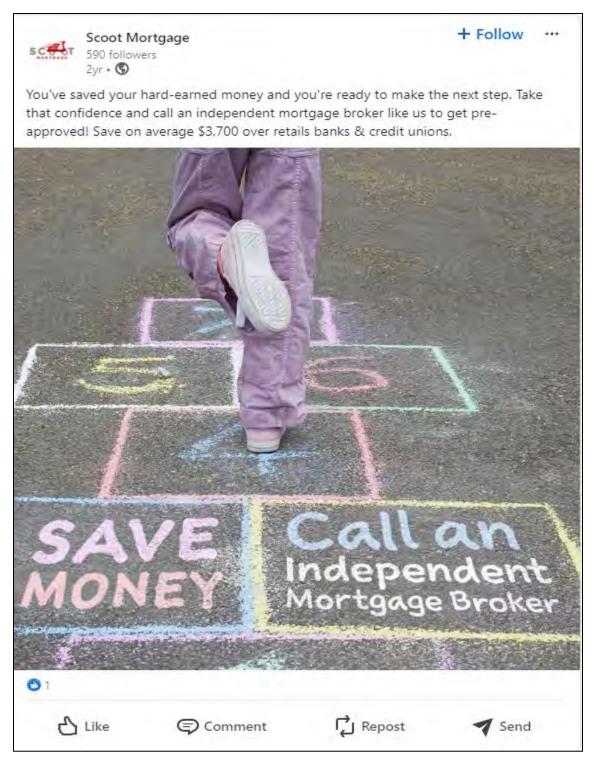
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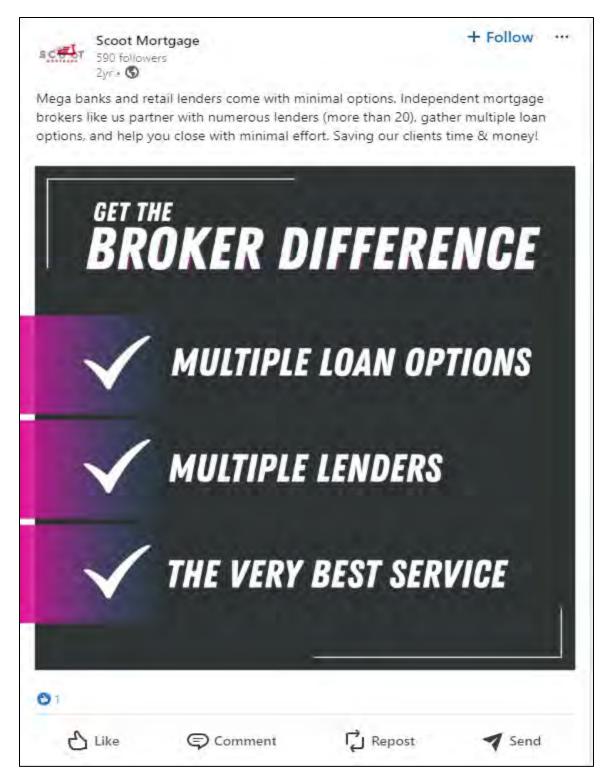
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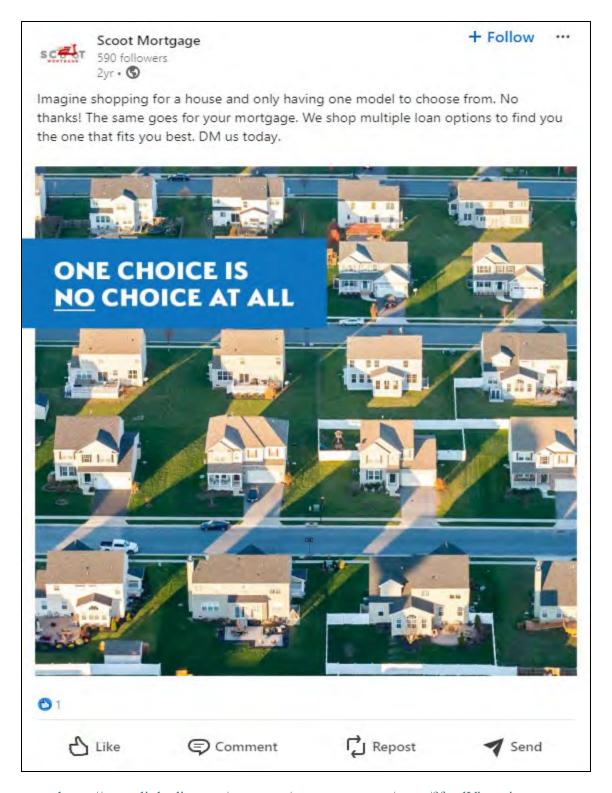
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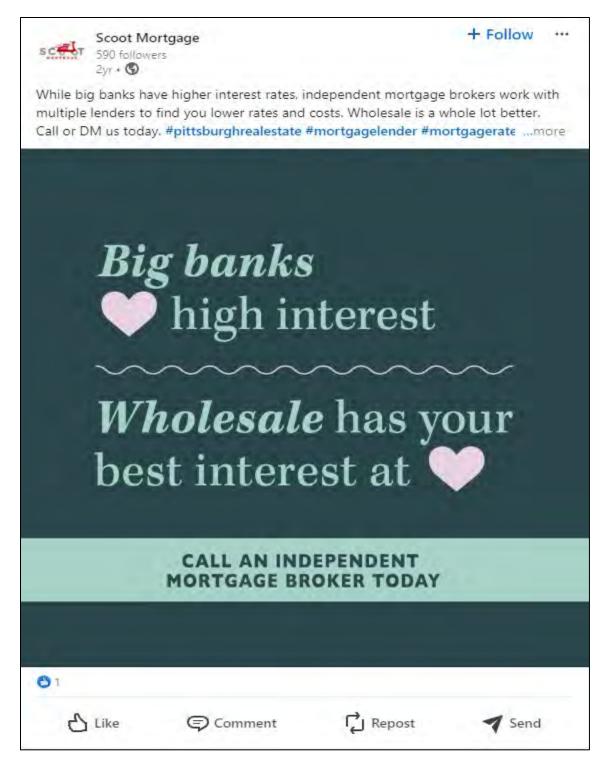
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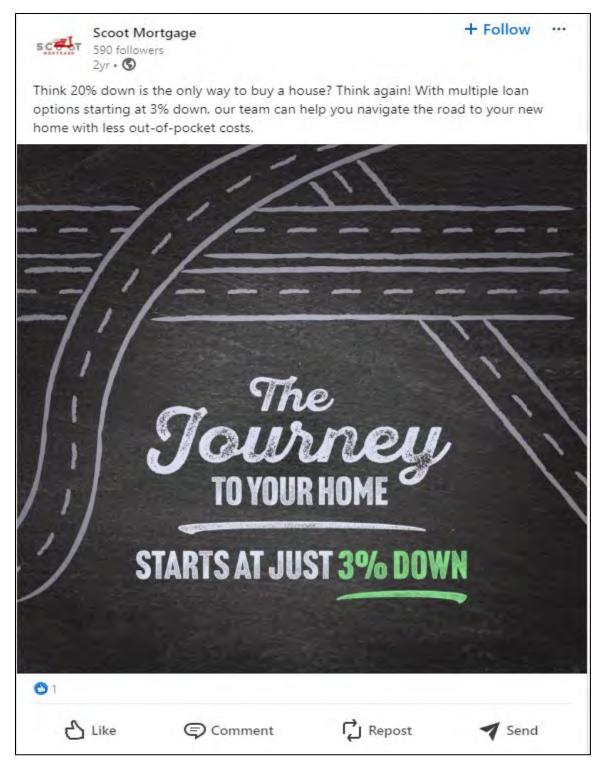
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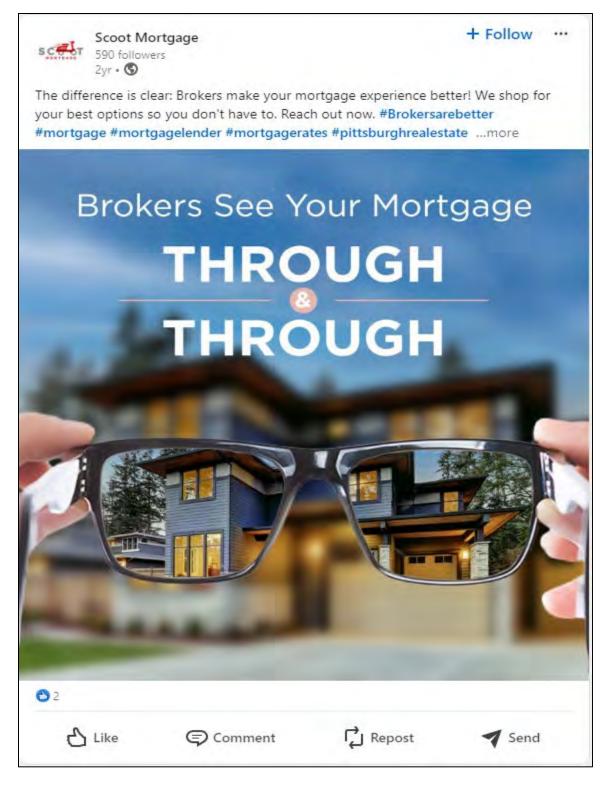
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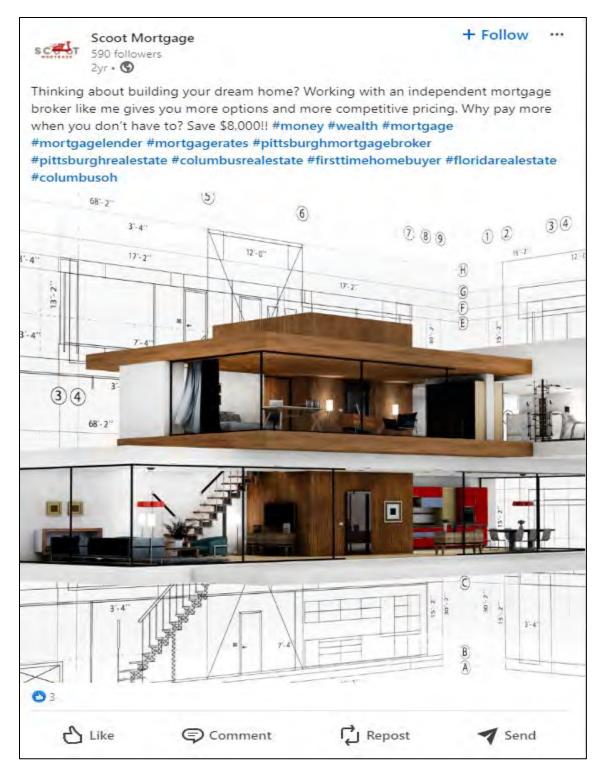
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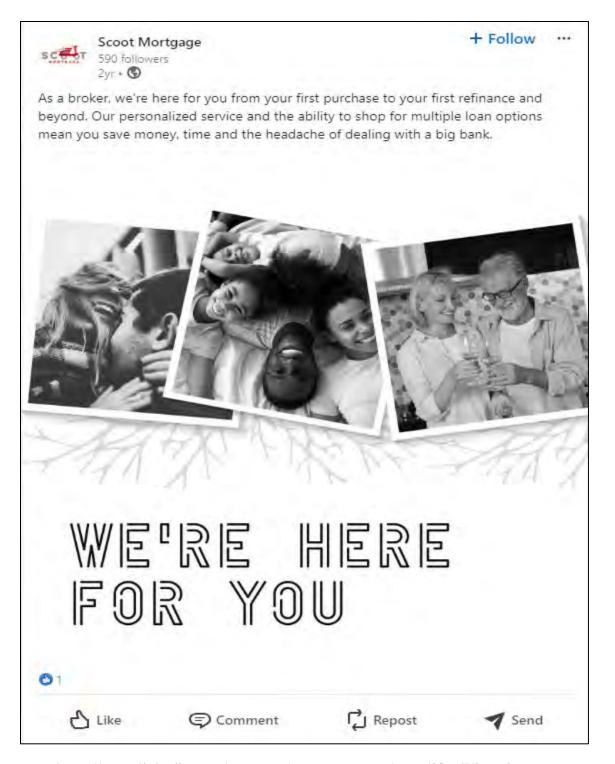
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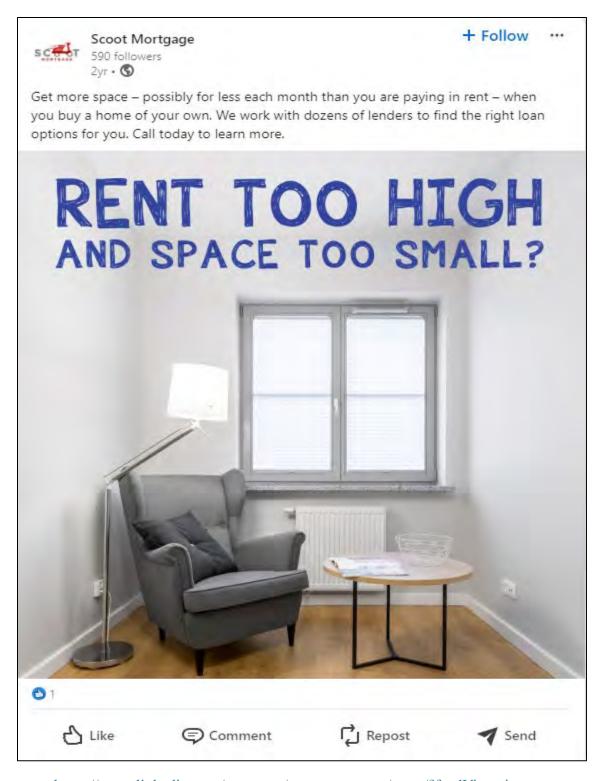
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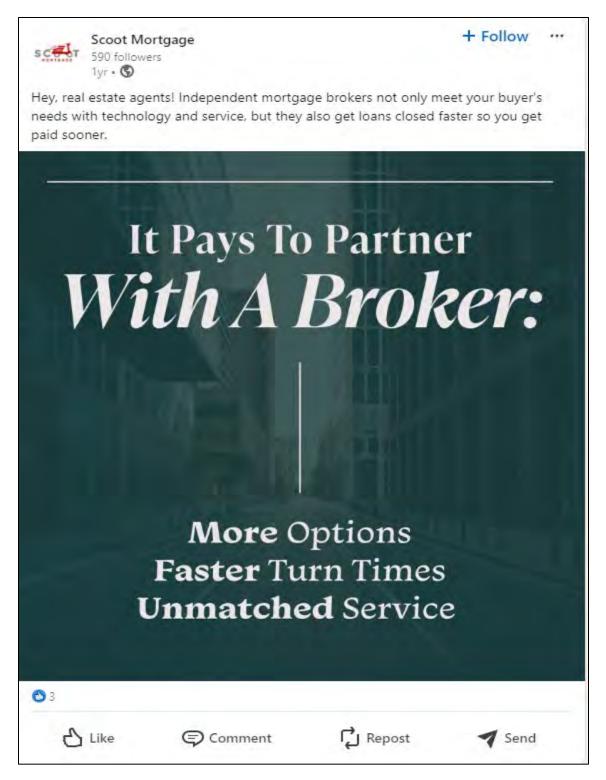
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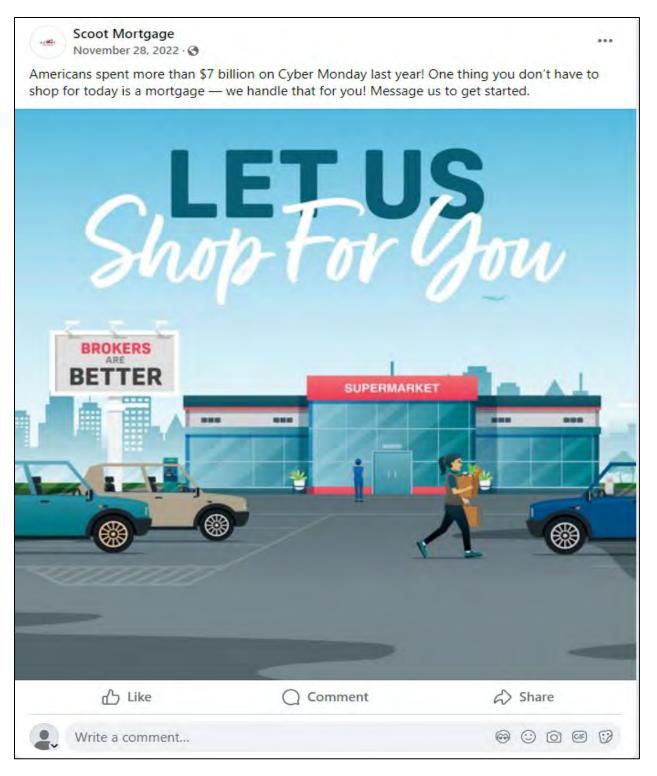
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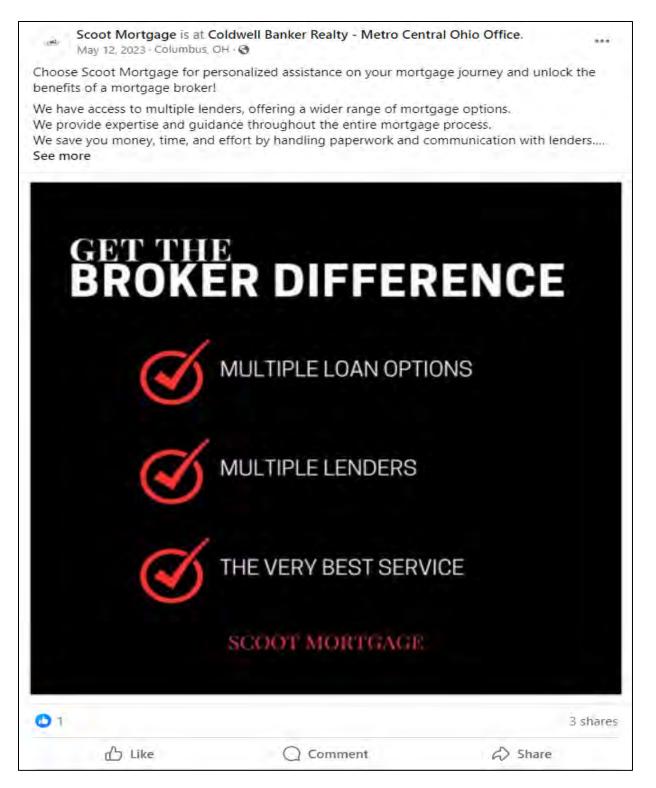
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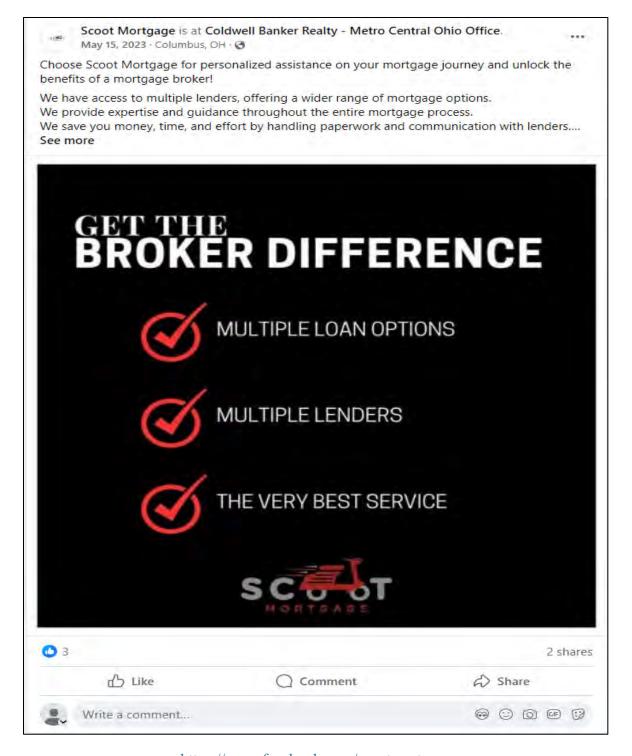
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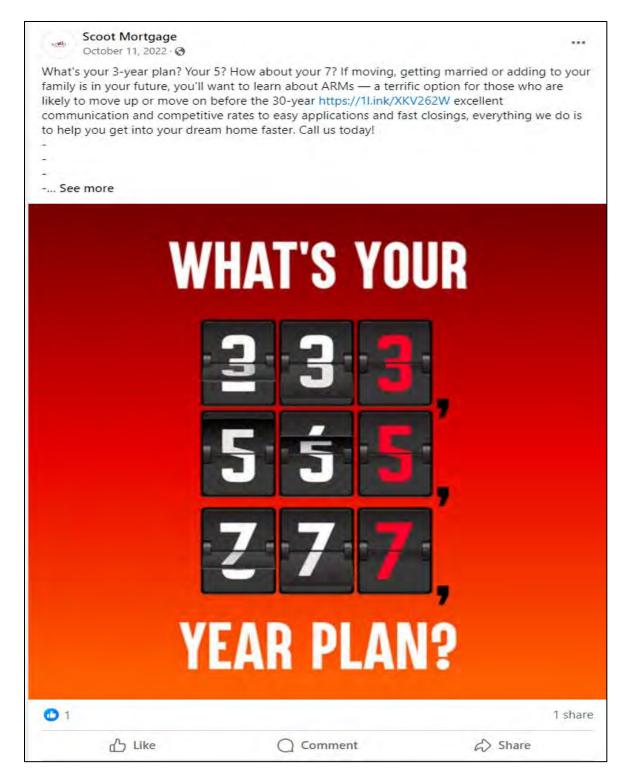
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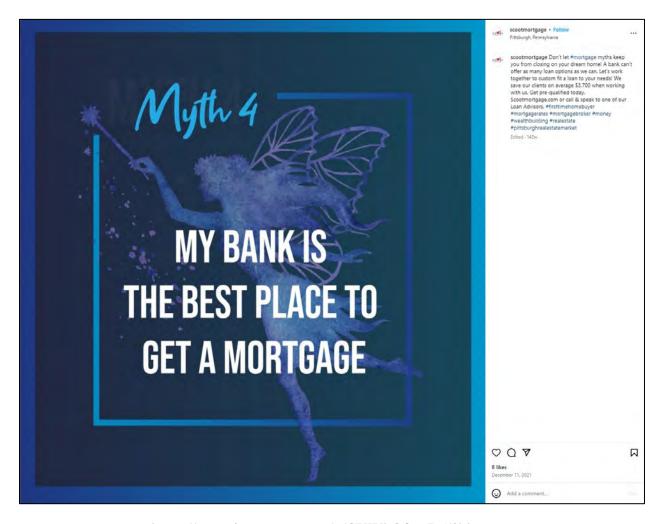
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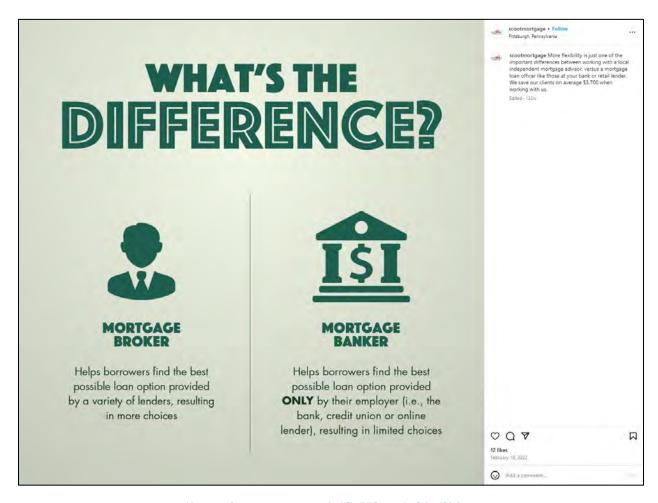
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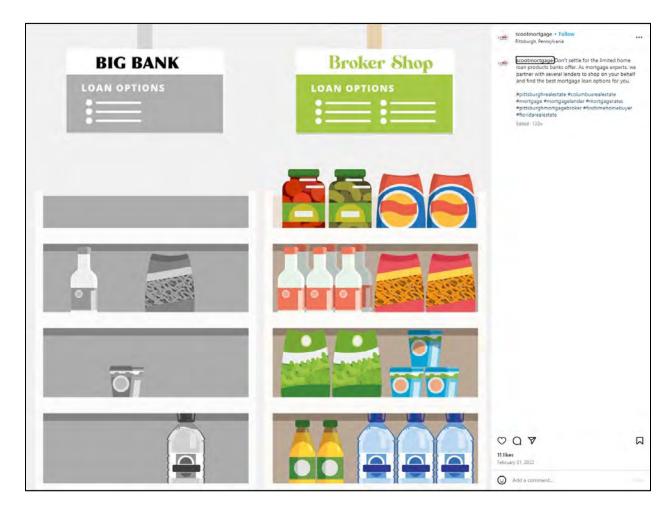
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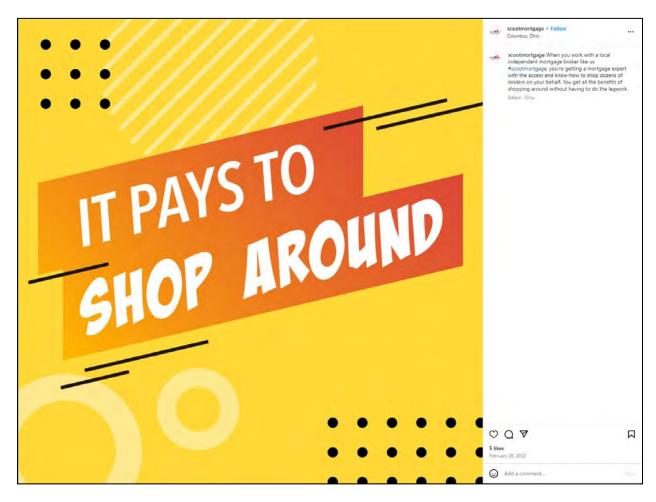
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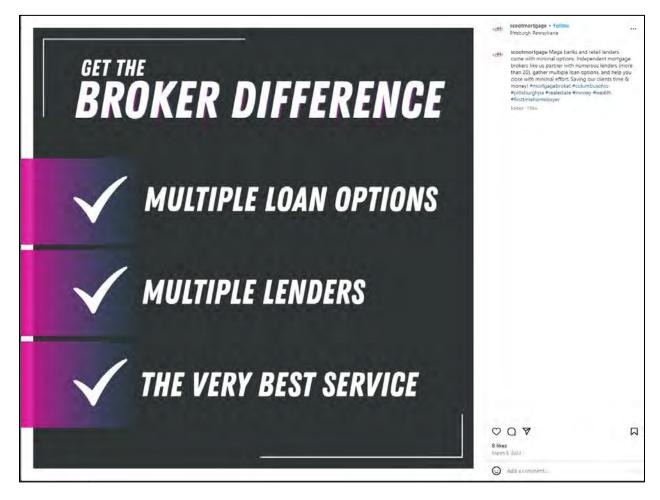
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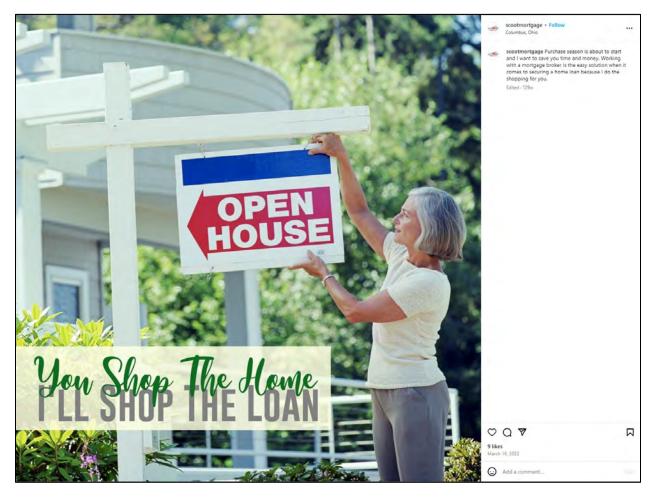
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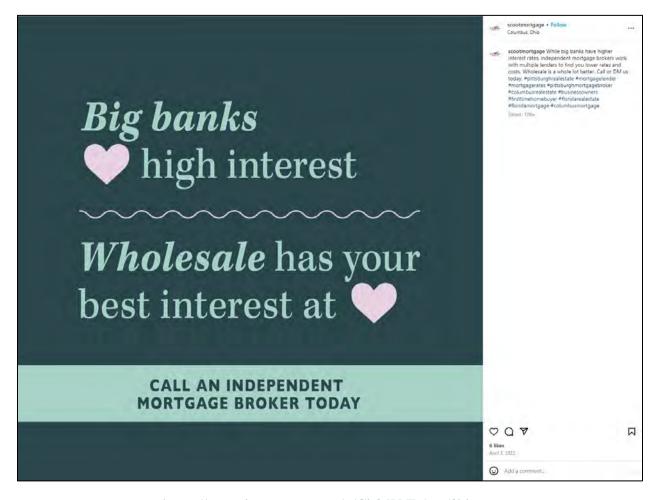
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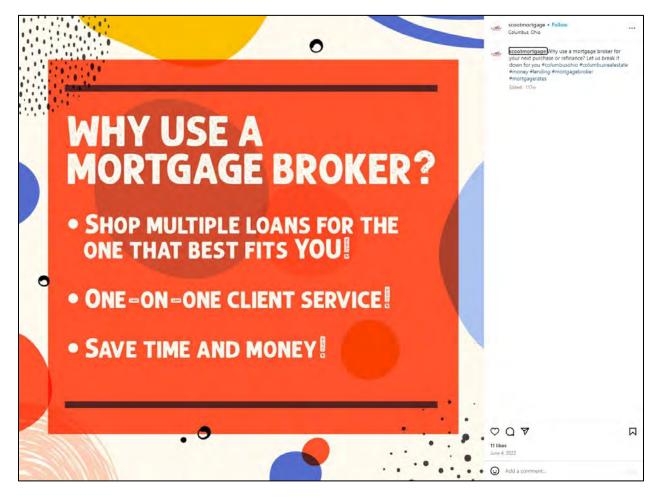
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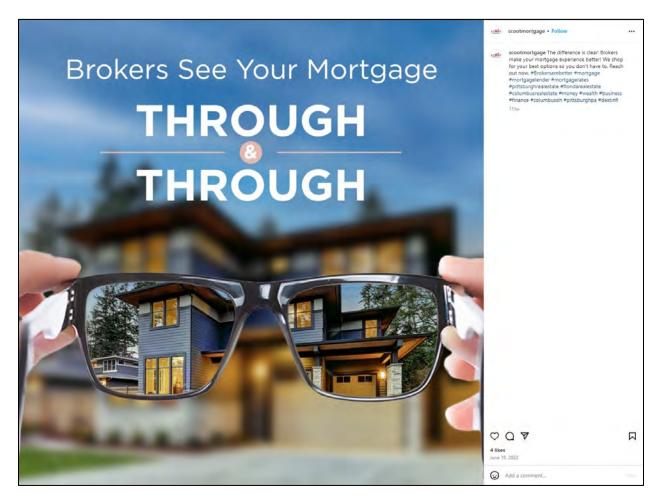
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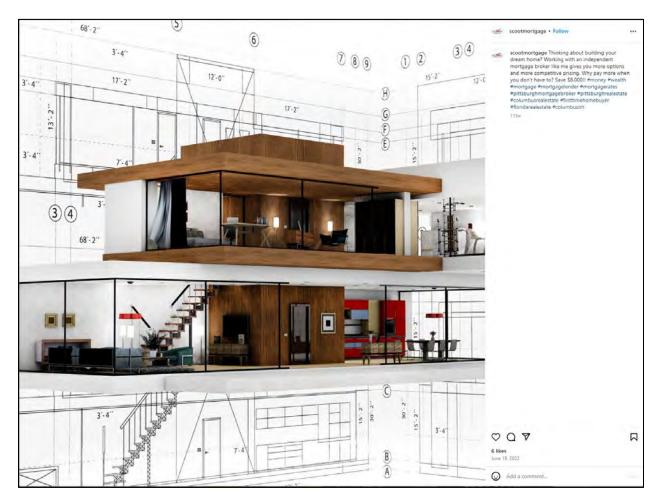
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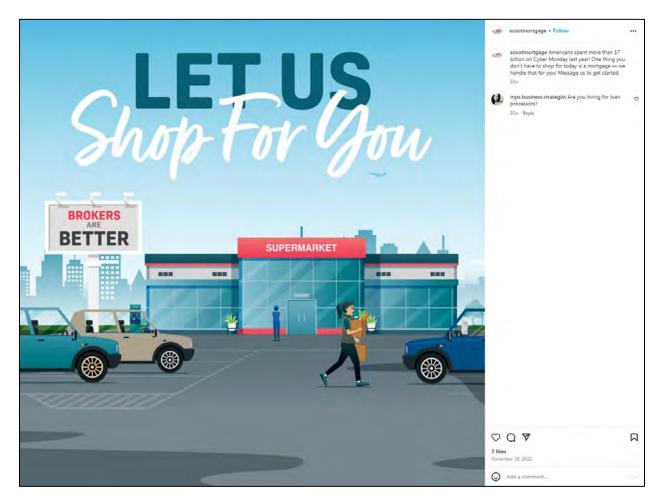
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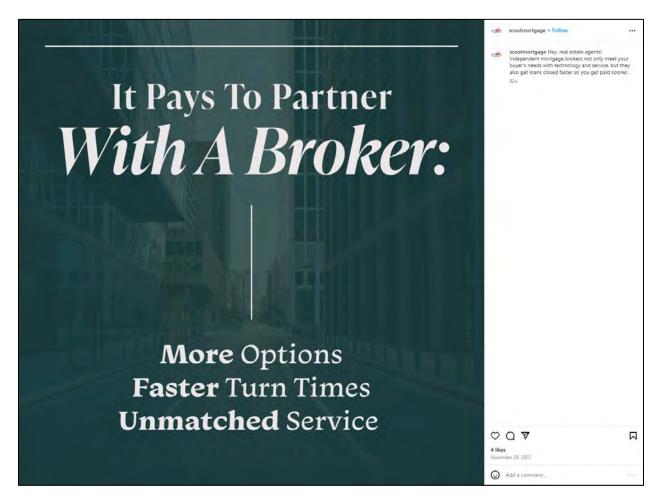
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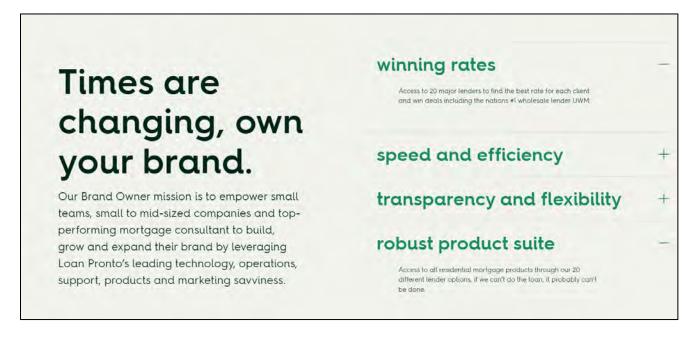
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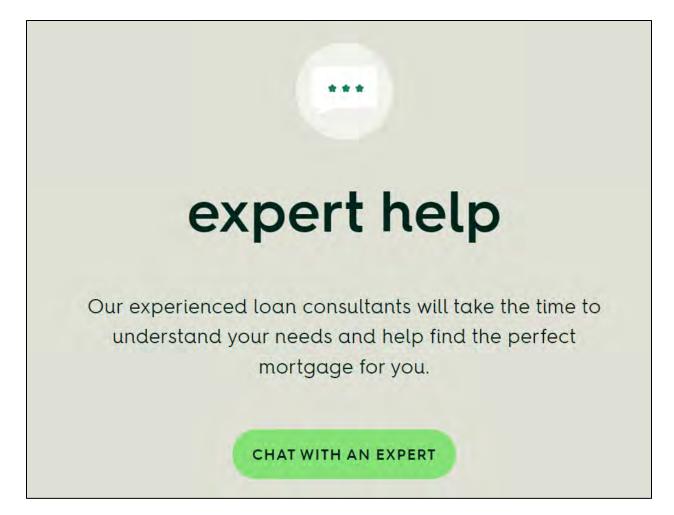
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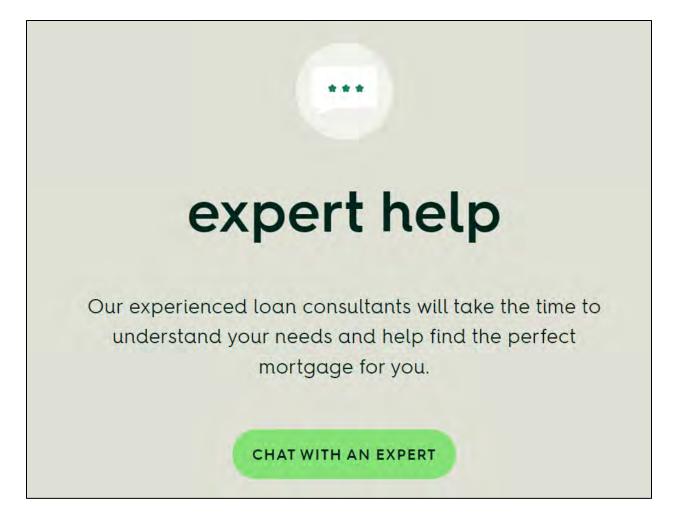
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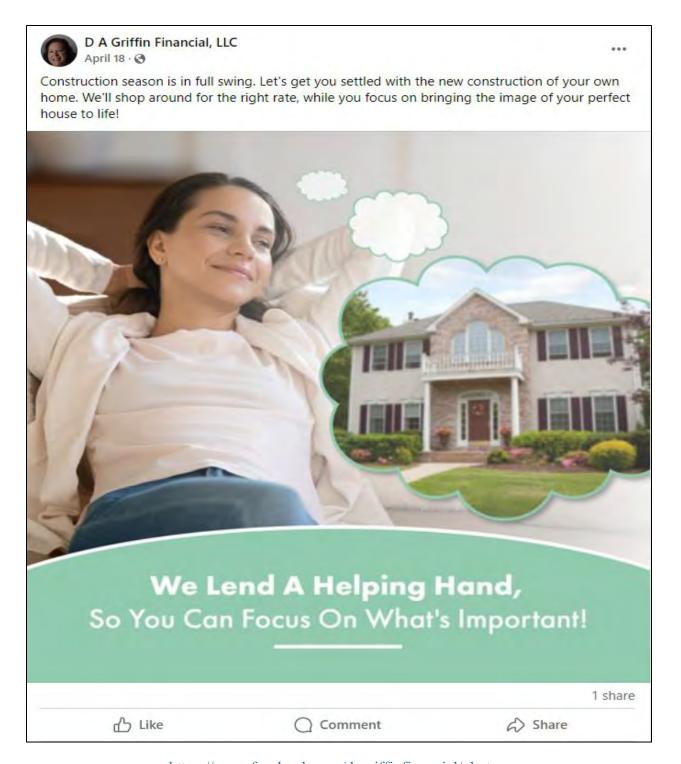
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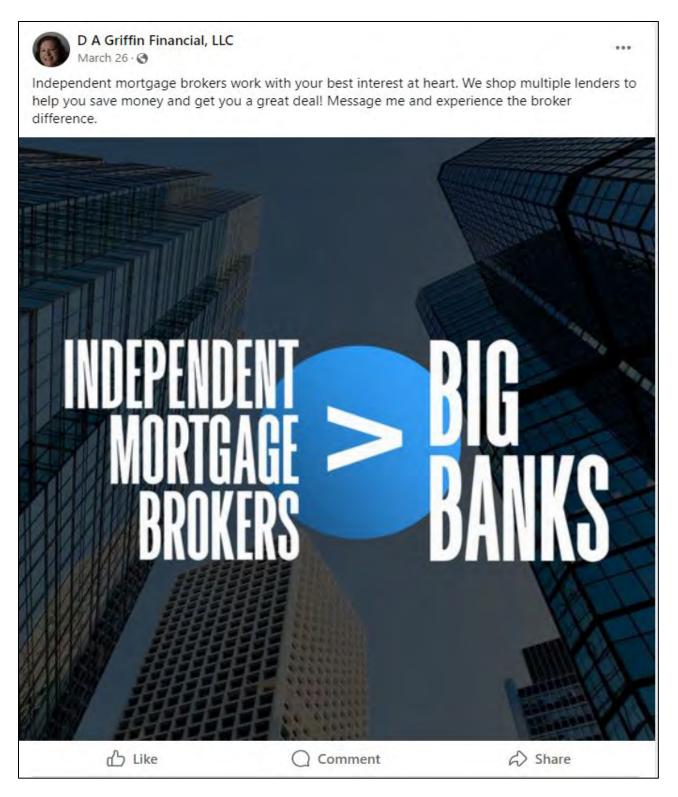
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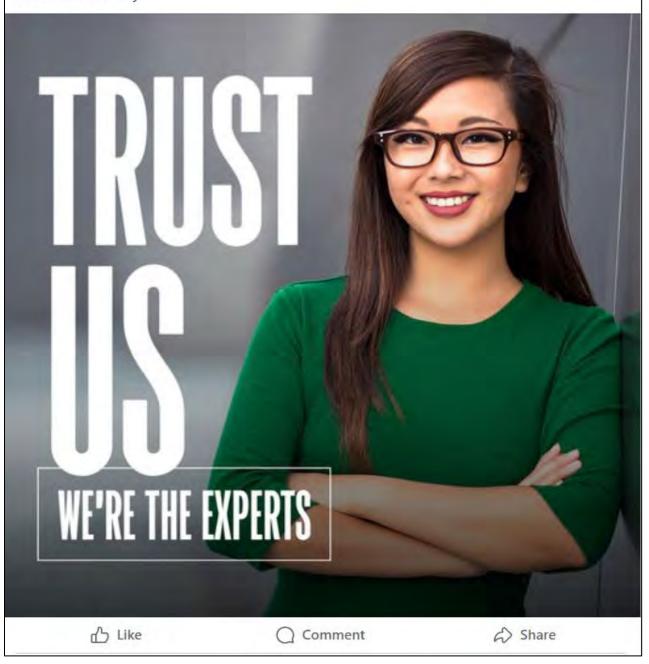
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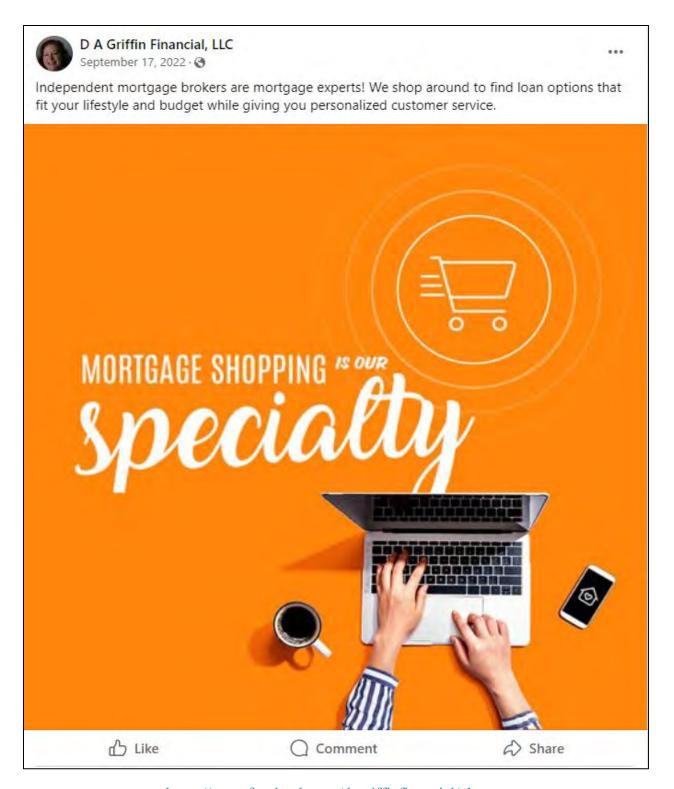
You can get into your dream home faster when you work with a mortgage expert. We know the industry inside and out and shop multiple lenders to ensure you have a mortgage that suits your needs. Call us today!



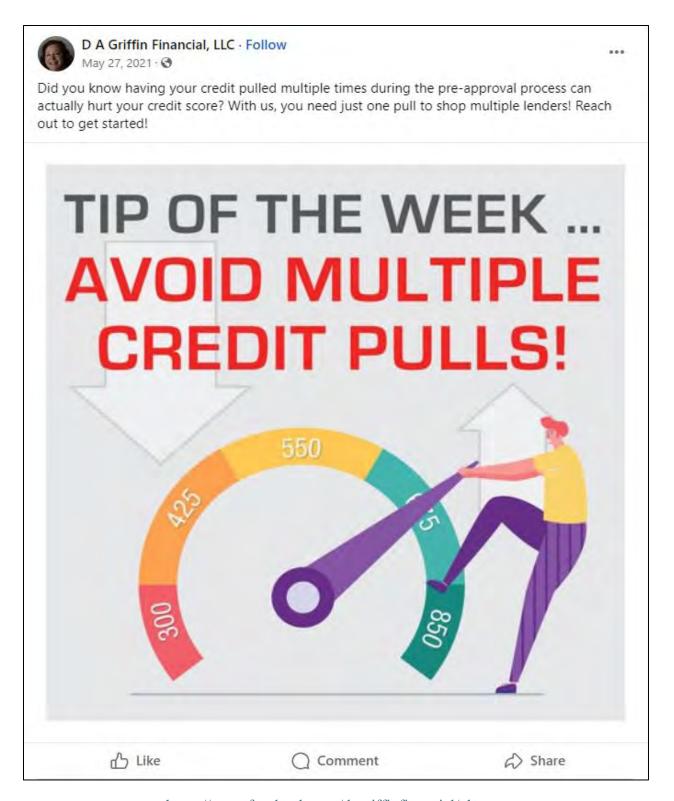
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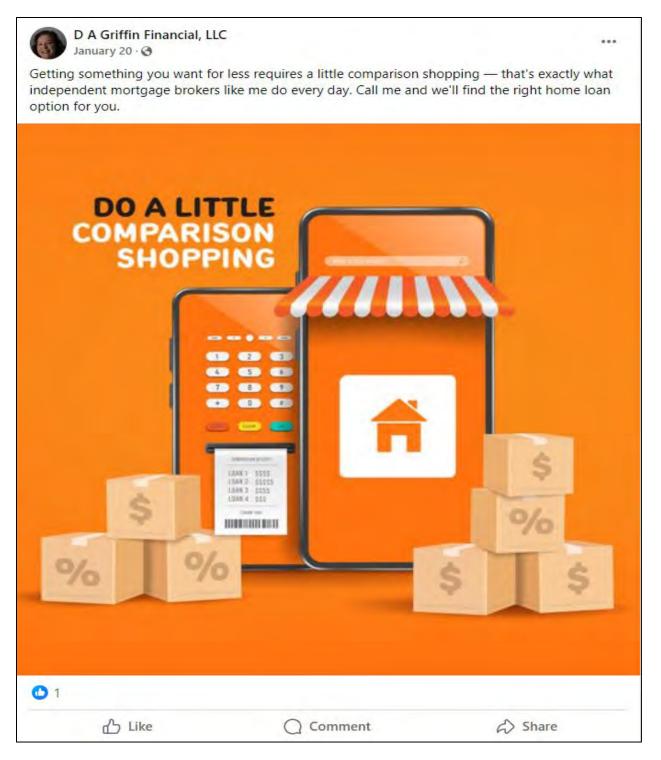
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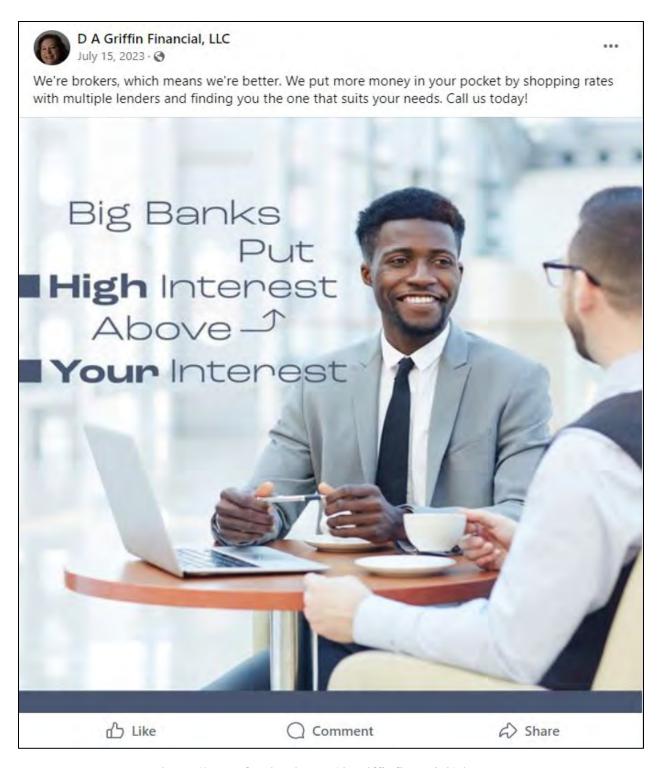
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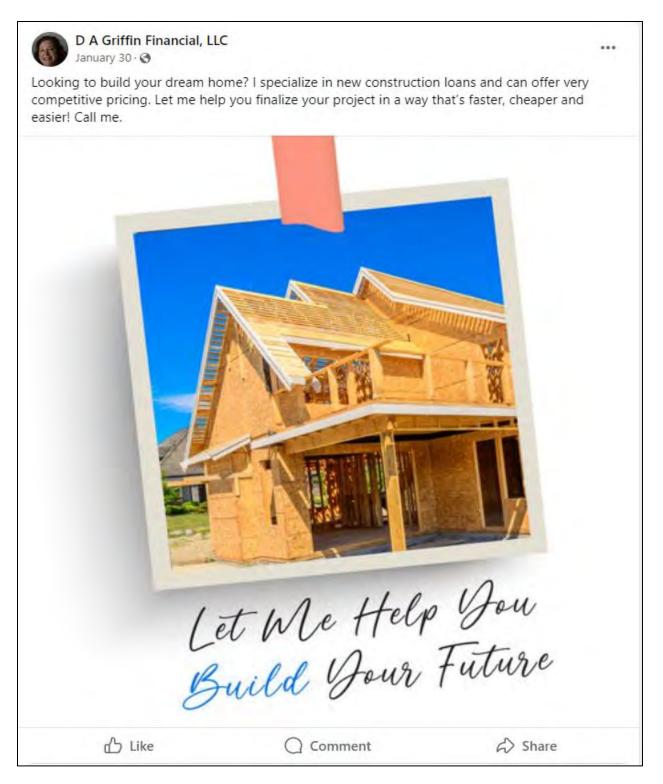
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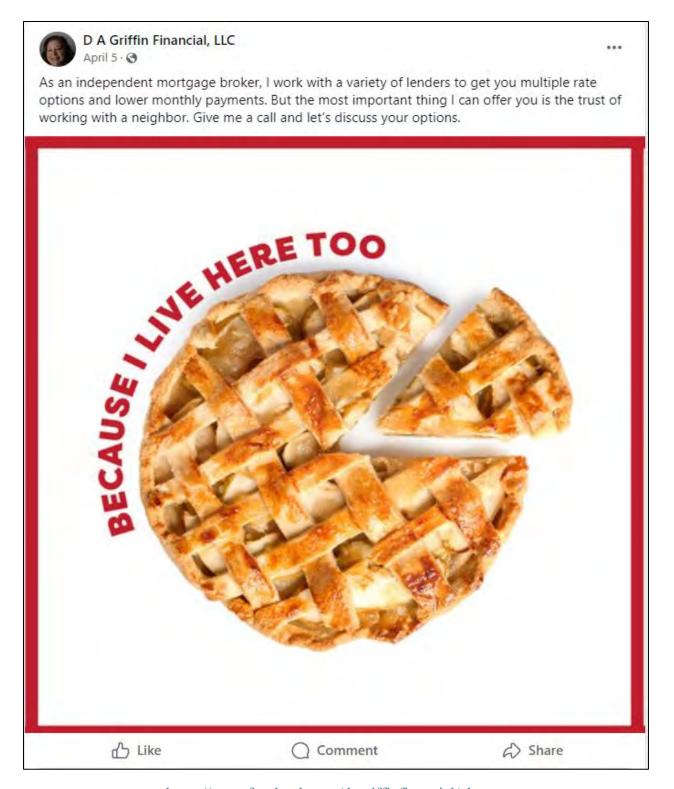
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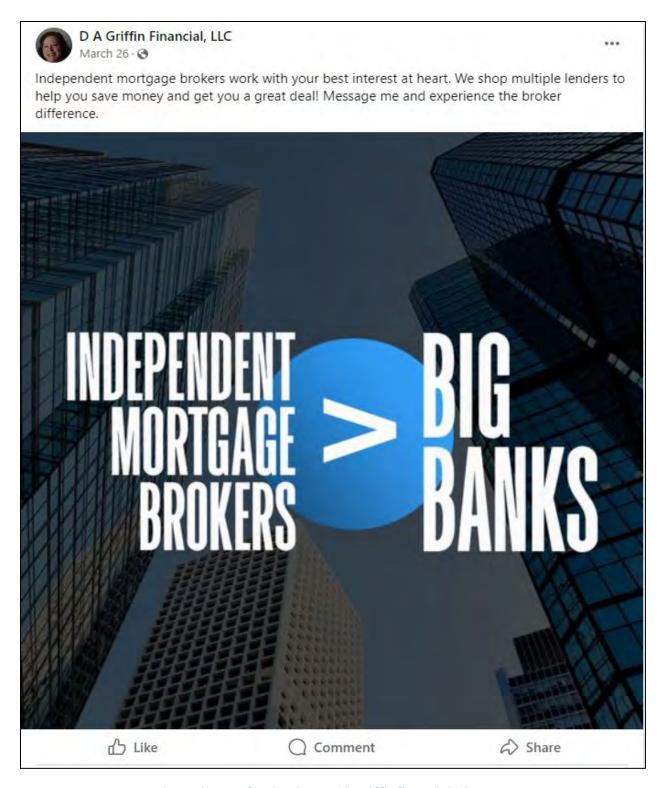
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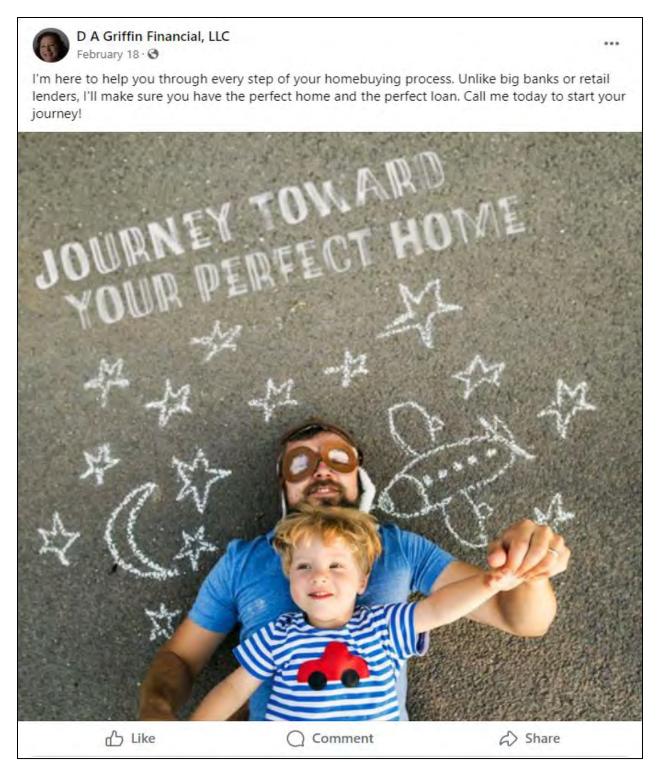
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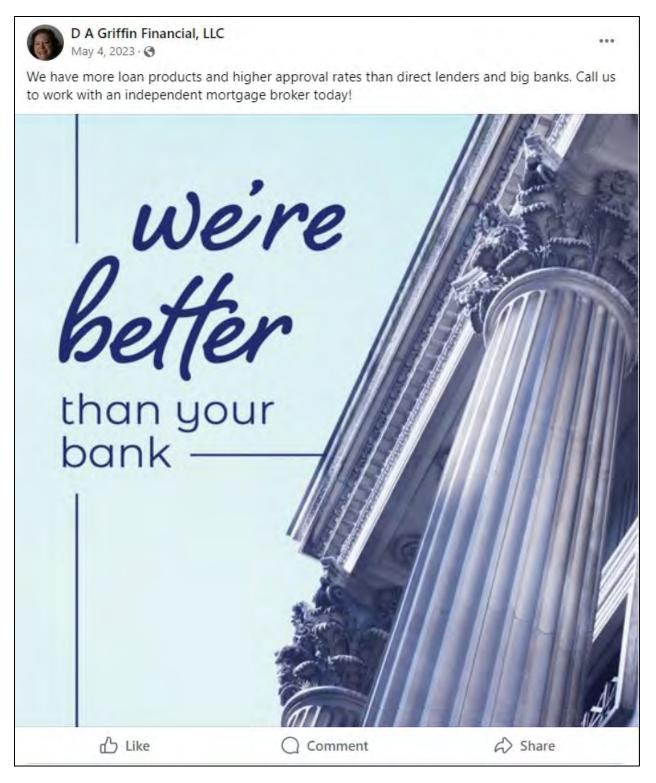
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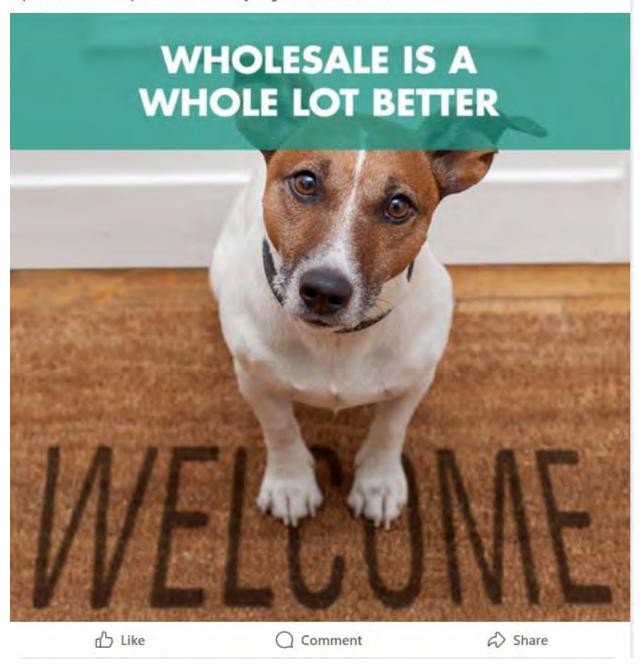
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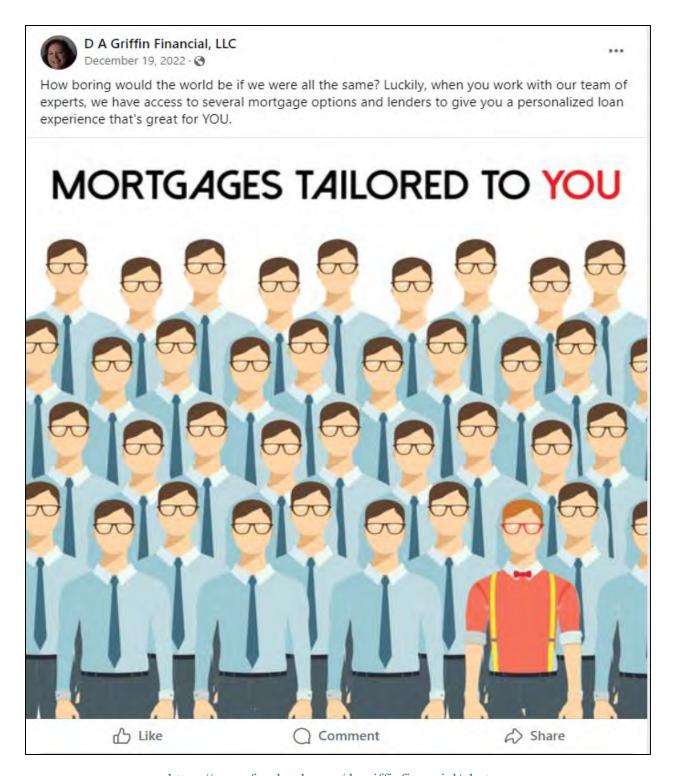
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Retail lenders/banks offer fewer options! Independent mortgage brokers like us are able to partner with multiple lenders to find you great loans and rates.



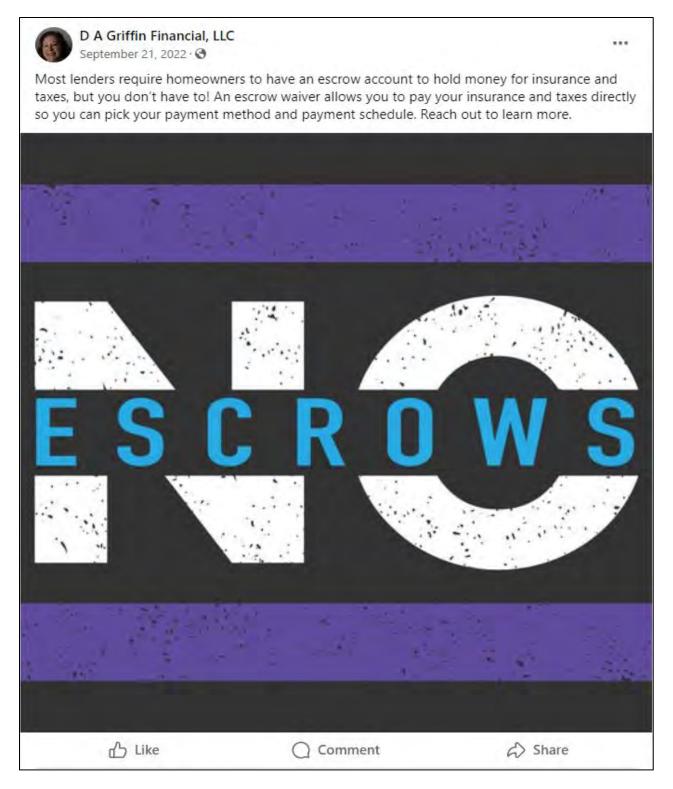
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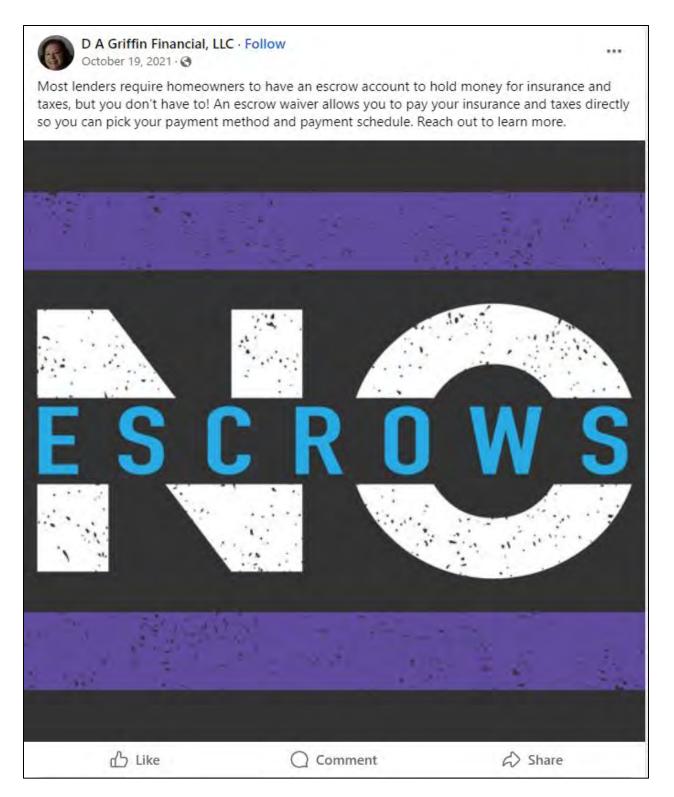
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Our mission is to serve our customers with honesty, integrity and competence. Our goal is to provide home loans to our clients while providing them with the lowest interest rates and closing costs possible, along with fast, efficient, personal service. Furthermore, we pledge to help borrowers overcome roadblocks that can arise while securing a loan.

Welcome to the official site of D A Griffin Financial, LLC. We are a full service mortgage BROKER company based in Fort Thomas, Kentucky. As a small business we are on top of every transaction at all times. We can help you realize your dream of home ownership or save you money on a refinance.

Start a conversation now. No matter if you are buying or refinancing we want to talk with you about your best options.

D A Griffin Financial, LLC

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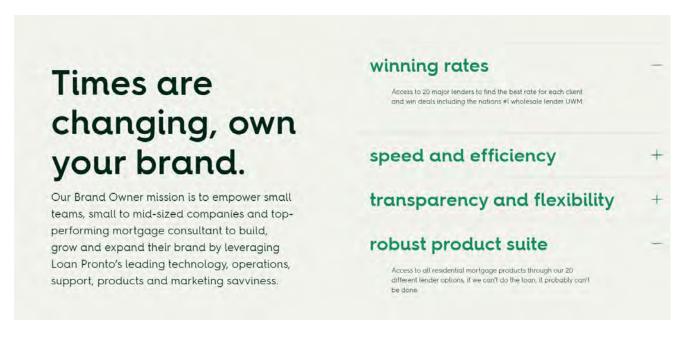
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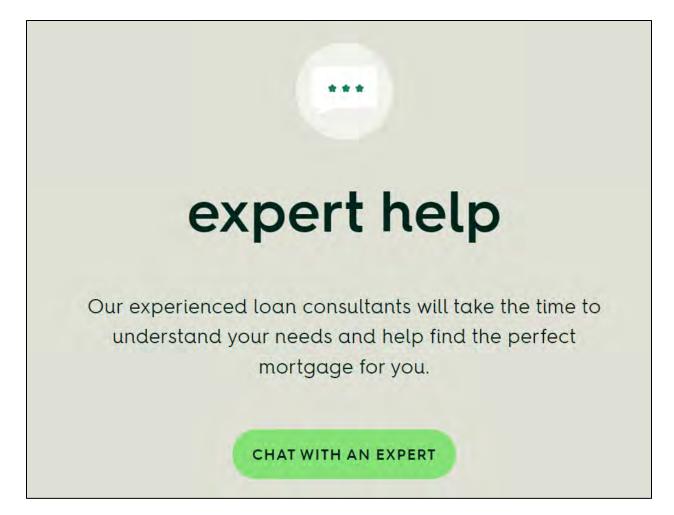
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ABOUT US

Vintage Lending is a Trade Name of C & E Financial Group, Inc.

Our team is committed to providing our clients with the highest quality financial services combined with the lowest rates available in your area. Our outstanding mortgage professionals will work with you one on one to ensure that you get a financial solution that is tailored specifically to meet your financing needs. Whether you are purchasing your dream home, refinancing a loan, or consolidating debt, our highly experienced team of loan officers can help you find the right loan program at the lowest rate no matter what your needs are. Our ultimate goal is to create lasting relationships with each of our clients so that we may continue providing excellent service for many years to come. Unlike many of the larger nationwide mortgage companies that are out there, all your information will be kept secure and private. To speak directly with an experienced mortgage professional simply give us a call anytime or feel free to utilize any of the interactive tools offered throughout the site. We look forward to working with you.

Vintage Lending is a Mortgage Broker and Correspondent Lender currently licensed in Arizona, California, Colorado, Florida, Idaho, Ohio, Oregon, Texas, Utah, Washington and Wyoming. With over 60 banks to choose from we are able to offer great rates, a variety of loan programs, and exceptional service. We have seasoned loan officers and pride ourselves in customer service, repeat business, and client referrals. We are actively recruiting and hiring experienced loan officers with proven sales experience in all states in which we are licensed.

https://vintagelending.com/index.php



Great customer service

At Vintage Lending we take pride in our great customer service. Our staff is here for you, so don't hesitate to contact us if you have any questions, problems or maybe a suggestion. We would love to hear from you.

Clients come first

We make sure our clients get the best support from our staff. We will walk you through the whole mortgage process and ensure your transactions close smoothly.

We offer superior loans and mortgages.

Vintage Lending works with multiple lenders. We can provide our clients with extremely competitive pricing. Now you can do all your comparison shopping with one company without wasting time with several banks or brokers.

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About Rick Kirschenbaum

I am an expert loan officer, specializing in customer service, mortgage knowledge, and achieving the best possible rate. I have a deep passion for mortgage lending (close to 20 yrs.) I love helping clients especially those with challenged credit and first time home buyers. In addition, I have done several loans over \$1,000,000 and have special selected lenders so my clients will get excellent rates and terms.



I have been in lending since 2002 and have closed thousands of loans. I have 4 goals when I work with a client and realtor.

- 1) closing loans in 12-22 days though often I close purchases and refinances in under 12 days.
- 2) Obtaining excellent interest rates.
- 3) Making sure the client does not get stressed in the mortgage jungle
- 4) On purchases, making sure the realtor has all information that they feel is necessary for confidence.

In reality, I am seriously in the people business. I strive for the highest level of quality not only in the loan but also with all people involved. Realtors, title, appraiser, clients, etc. If we work as a team and stay positive, cheerful, confident, and complete our work as promised, the client and the realtor will achieve the goals desired.

Clients that are self employed, understand that your in good hands when working with my team and I.

Tough self employed loans are not a problem. However since lending is complicated, if you are self employed, do not try to figure out if you will be approved or not. We can approve loans that many banks and credit union will not approve. Leave that to us.

In closing, we are not a bank or credit union that works in a more narrow box of lending. We are mortgage brokers that have many resources that are outside of the normal box of lending.



Shaker Hts High School 1972 Shaker Hts, Ohio University of Utah/graduate 1977 Salt Lake City, Utah

https:/www.loansbyrick.com/

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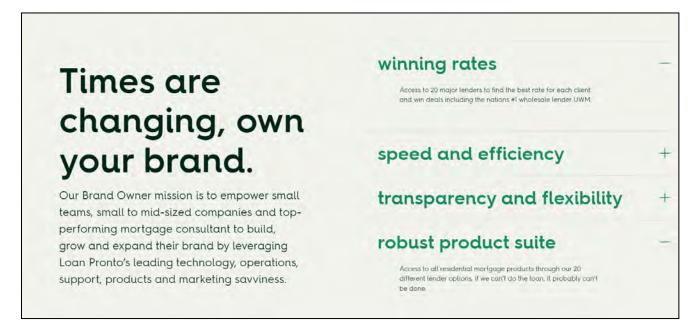
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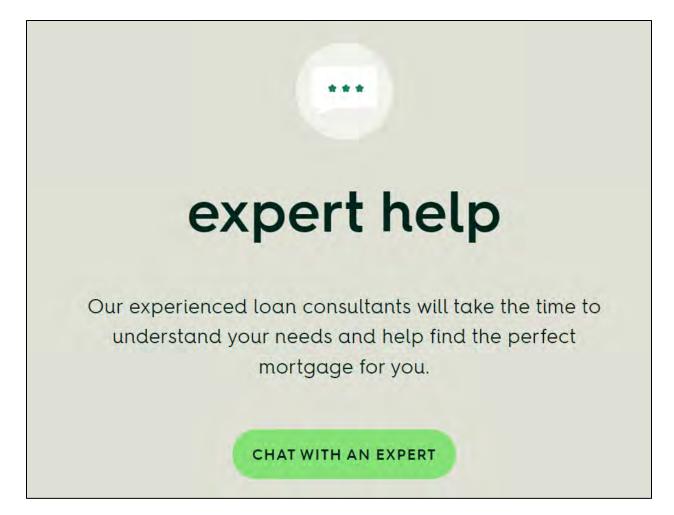
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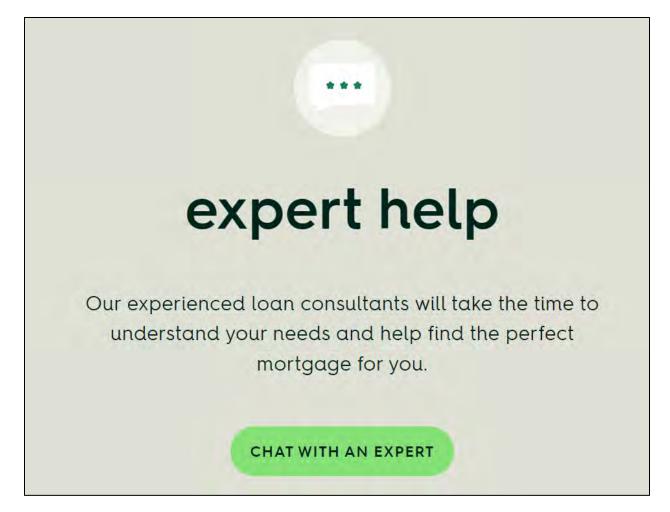
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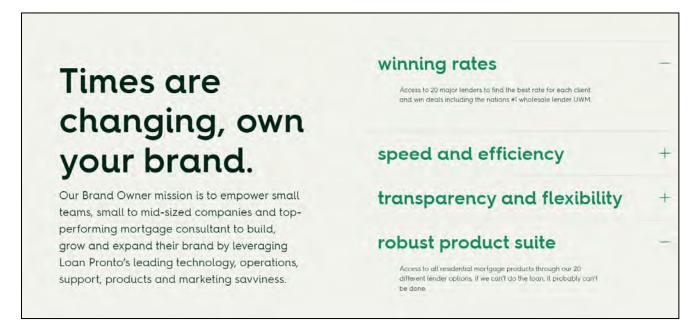
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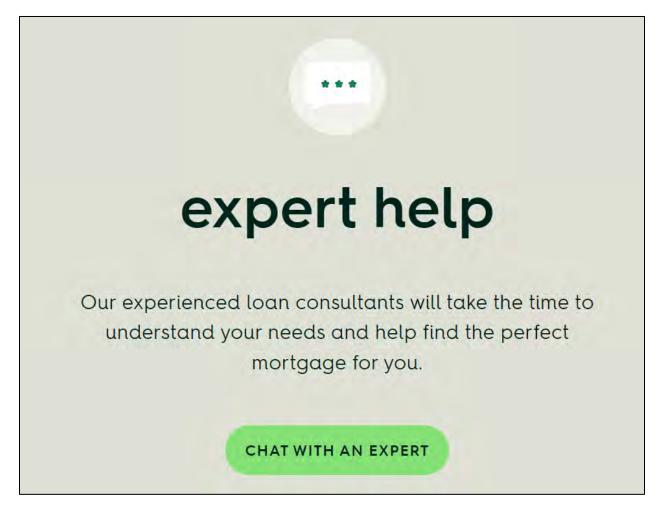
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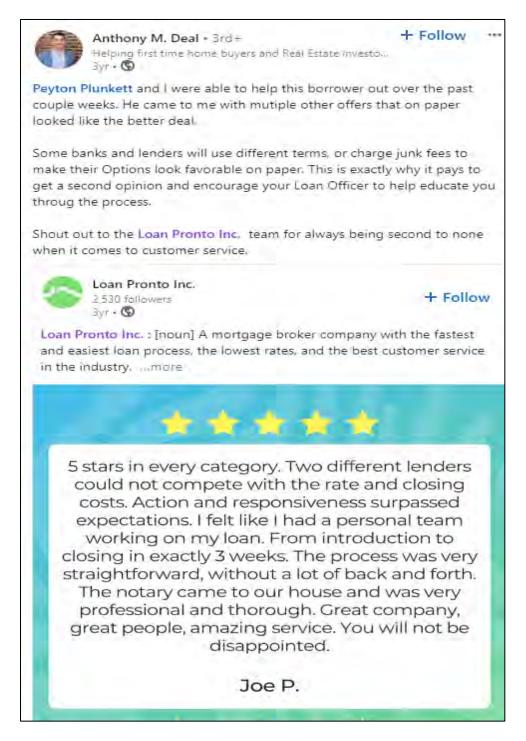
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IT PAYS TO PARTNER WITH UWM



LOOK AT ALL THE WAYS WE CAN HELP YOU & YOUR BORROWER'S BOTTOM LINE

At UWM, we know that rates aren't the only things that help you win a deal. Additional fees, business expenses and more all figure into the cost of every loan. That's why, in addition to competitive rates, we're always looking for ways we can help you be even more competitive with your costs.

https://www.uwm.com/resources/save-with-uwm

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CUSTOMIZE YOUR LOAN

Outprice your competition by offering custom rates to the thousandth decimal point with Exact Rate. Give yourself the edge with borrowers by picking the exact number of days you want to lock a loan in with Custom Lock. And with Flex Term, allow borrowers to choose any term, from 8–30 years, that fits their budget and allows them to potentially save thousands of dollars in interest.

Learn More.

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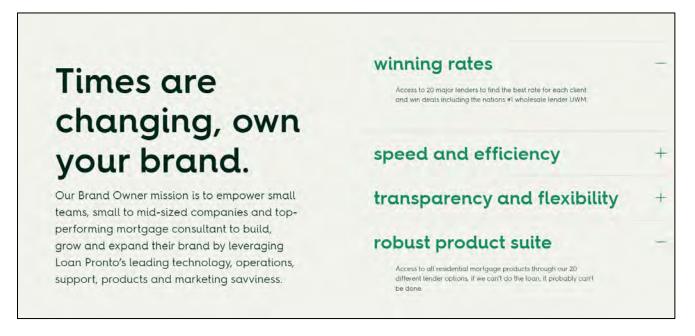
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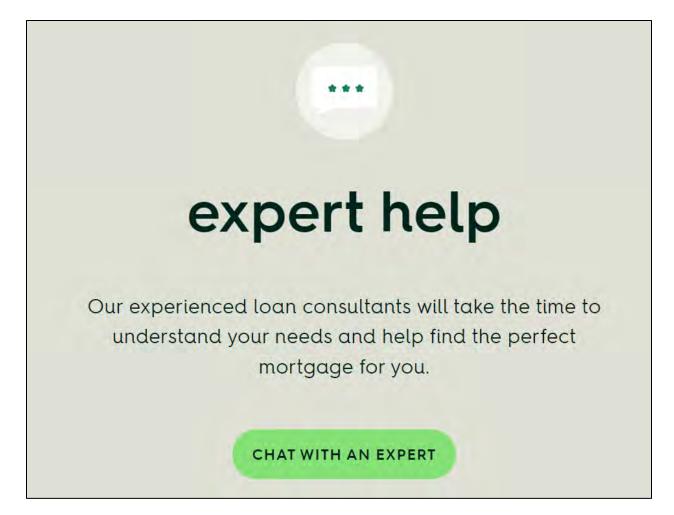
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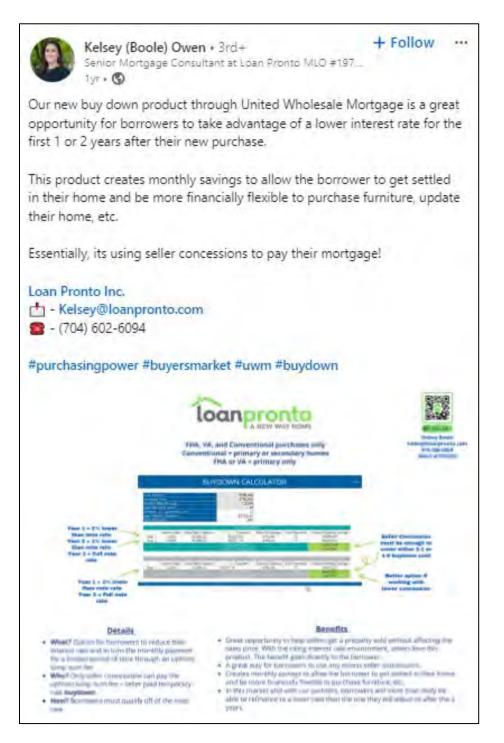
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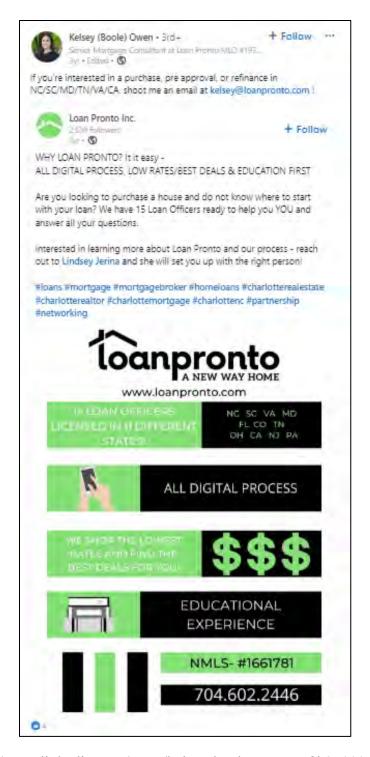




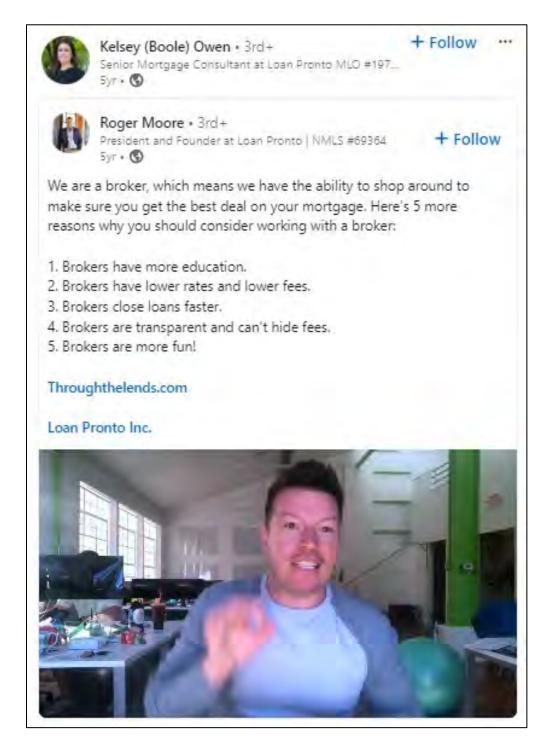
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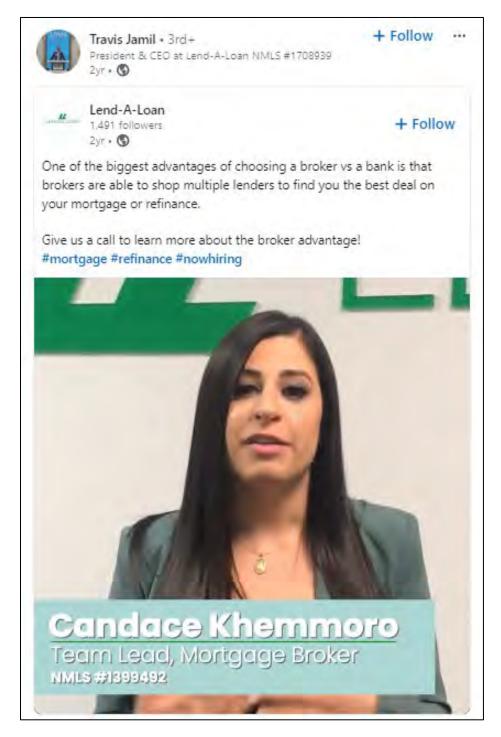
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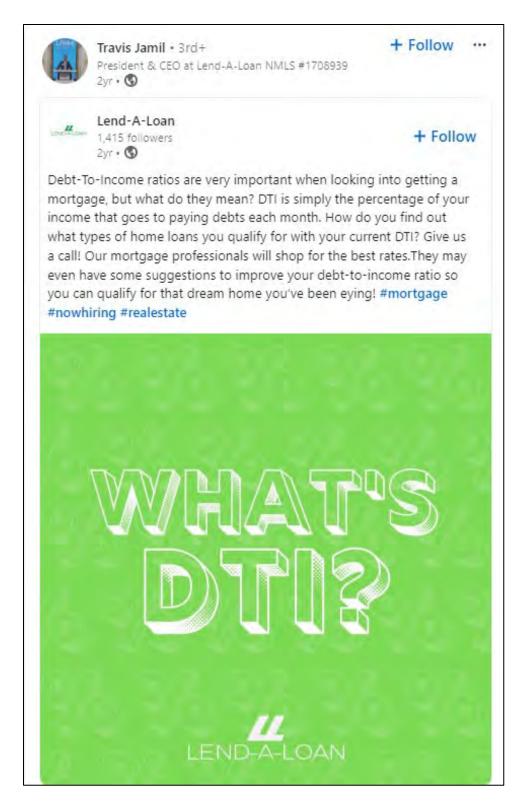
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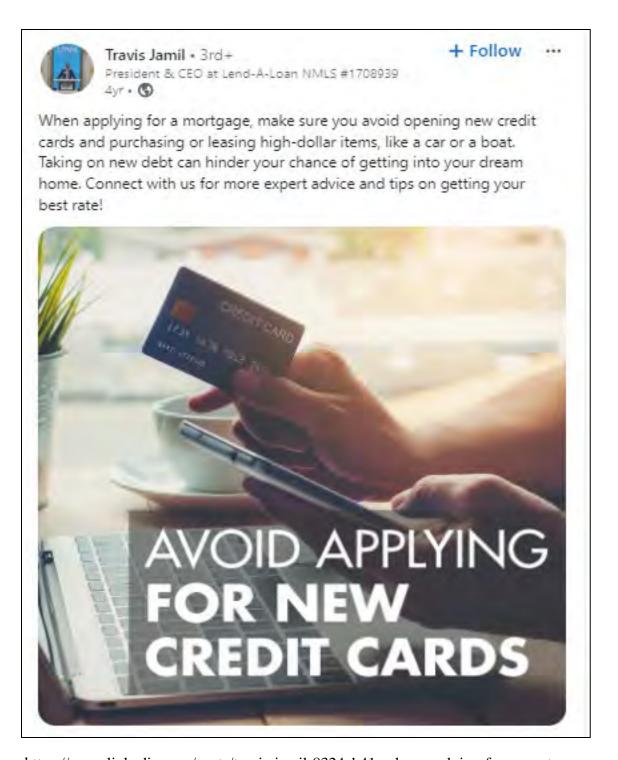


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Travis Jamil, LinkedIn, Apr. 13, 2022,

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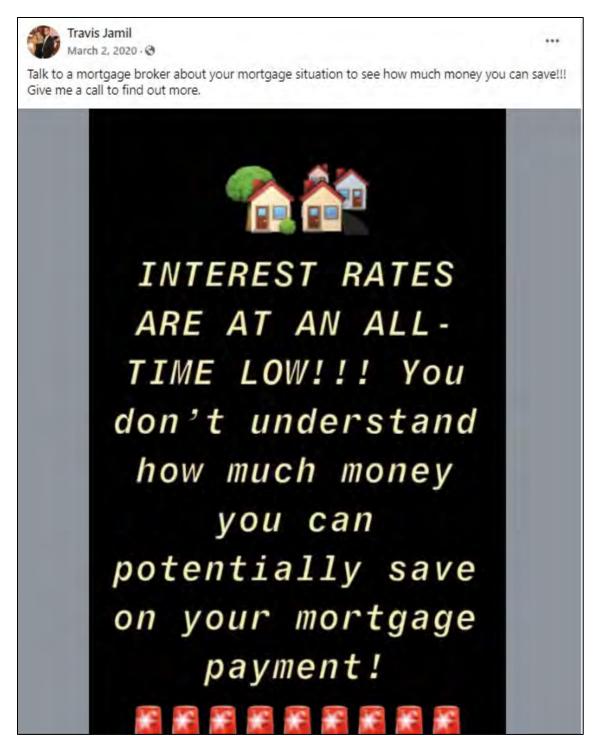
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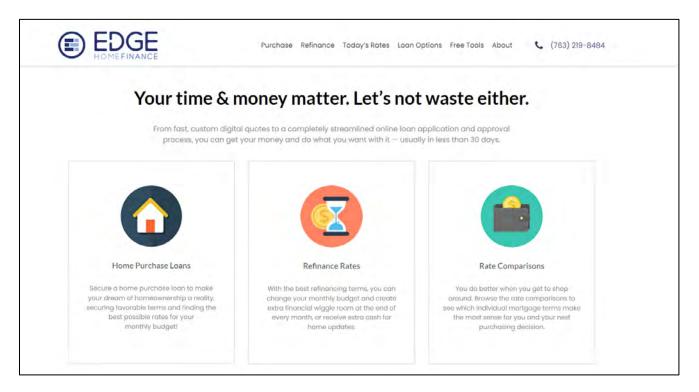
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Need financing options on a home, or other real estate? Choosing a purchase loan product that matches your goals and making sure you get a favorable rate doesn't have to be stressful!

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Qualify Me Now!

- Fixed-Rate Mortgage
- Adjustable-Rates Mortgage (ARM)
- Conforming Loans
- Jumbo & Super Jumbo Loans
- FHA, VA & USDA Loans
- Terms from 5 to 30 Years

https://edgehomefinance.com/buy/

Edge Home Finance is a true Mortgage Broker...

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So why deal with a Mortgage Broker over a Bank?

Mortgage Brokers represent you, the customer, not the lender. Because they are not employees of a lending institution, Brokers are not limited in the product they can offer you. Brokers seek out the best lender package to suit your specific situation, whether it's with a Chartered Bank, Trust or Insurance Company, or Private Funds.

There is a wide assortment of options and features available to homebuyers today. Shopping around takes a lot of time and effort. The mortgage process within today's very competitive marketplace intimidates many homebuyers. It pays to work with a mortgage professional who will represent you and ensure the mortgage you get is the one best suited to your needs.

Choosing the wrong mortgage can cost you thousands of extra dollars. Mortgage Brokers are trained professionals who can help you save on your mortgage dollar.

Reasons to use a Mortgage Broker?

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- They are experts at matching you with the best-suited mortgage.
- They work for YOU, not the bank.
- . Up-to-date on all the mortgage rates, terms and re-payment options available on the market.
- They only specialize in mortgages and are knowledgeable on current trends.
- . They increase competition in the market place, thus keeping rates low.
- . They save you time and money!
- · Brokers have vested interest in satisfying your needs since they rely on referrals and repeat business.

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These rates, and preferences for types of mortgages, can change daily, depending on economic circumstances or based on the size of an institution's portfolio in a particular type of mortgage. Your Mortgage Broker keeps current and knows which lender to approach first. As a result, mortgage rates obtained by Brokers are among the best available at the time of placement.

Why should I go to a Mortgage Broker first?

A professional presentation to a lender on the first application will get the best response and save you valuable time and money. Secondary applications with previous credit bureau inquiries may be more costly.

Often the success of obtaining mortgage approval depends on the way a proposal is presented and to whom it is sent. Your Mortgage Broker is trained to present your mortgage proposal where and how it will get the most immediate, positive result.

You don't call an insurance company for insurance – you use an insurance broker, because of their expertise, product knowledge and rates. So remember, call your mortgage broker first!

How do Mortgage Brokers get better deals than many Banks?

The lenders who work with mortgage brokers include traditional sources, such as chartered banks, trust companies, as well as corporate and private pension funds.

In addition to these sources, brokers often develop professional relationships with private sources of funds, termed private lenders. These lenders can provide many various mortgage products not available at conventional sources.

https://edgehomefinance.com/about-us/



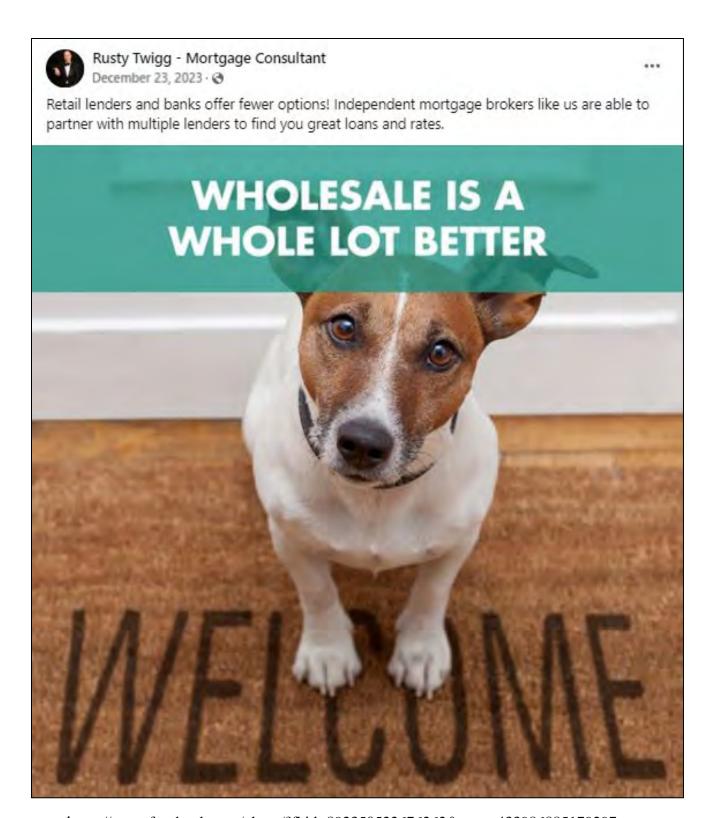
Rusty Twigg - Mortgage Consultant April 2 · ❷

Sure, banks and other lenders can get you a mortgage — but something just doesn't add up. Only an independent mortgage broker like me can offer personalized service, extensive knowledge of your specific market and access to an impressive range of loan products. Ready to chalk up a win? Call me today!



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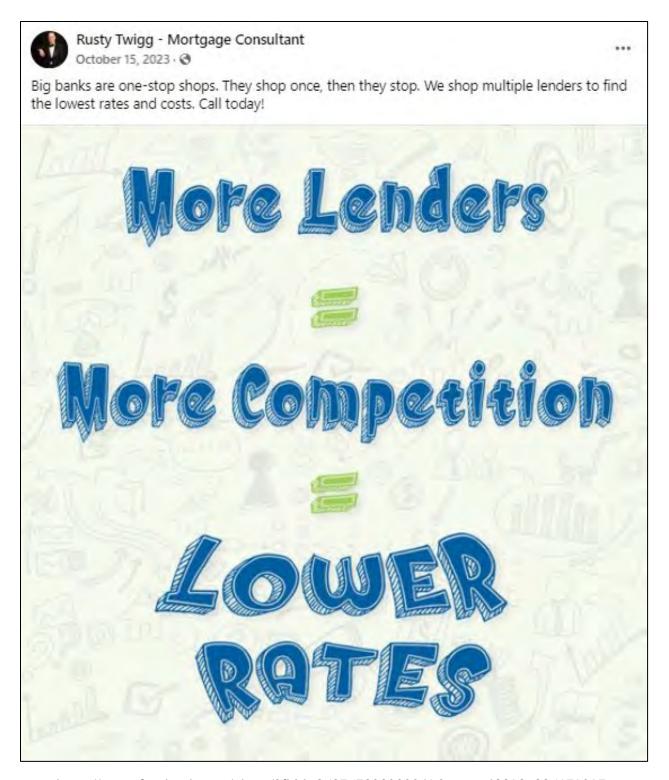
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In the market for a jumbo loan but want one that suits you? Then you can forget going to most big banks or retail lenders. If you're looking for options, do yourself a favor and give me a call so I can show you that jumbo loans don't have to be a one-size-fits-all proposition.



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Rusty Twigg - Mortgage Consultant September 26, 2023

Retail lenders' loan offerings are restricted to their own products, so they can't shop around to find you the greatest possible rate. Rest assured that when you work with me. I'll check multiple lenders to get you a low payment.



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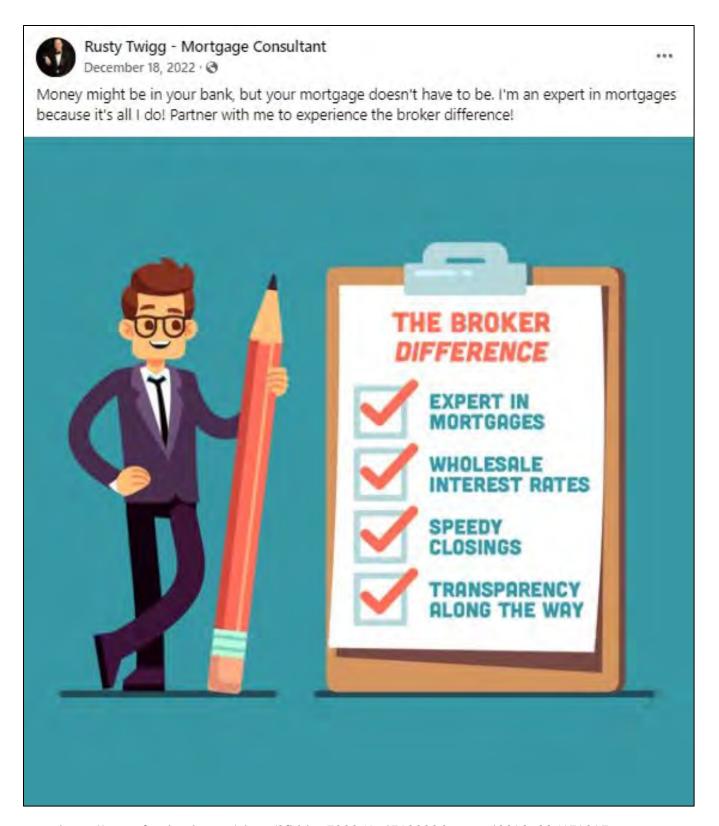
Rusty Twigg - Mortgage Consultant August 6, 2023 · ♥

**

The homebuying process can be stressful, and banks don't always put your interests first. Working with a mortgage broker means working with someone who ensures you're taken care of every step of the way. Call today for loan options.



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Rusty Twigg - Mortgage Consultant

December 11, 2022 · 3

The perfect home is different for everyone — and the perfect mortgage should be, too. As independent mortgage brokers, we're able to offer competitive rates on loans up to \$3M. Call me to learn more!



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Rusty Twigg - Mortgage Consultant May 17, 2022 · ❸

Ready to start house hunting? First, make sure you get a pre-approval letter from an independent mortgage professional like me. This will help you shop within your price range and give you the upper hand in the event of a bidding war. DM to learn more.



GET PRE-APPROVED FIRST

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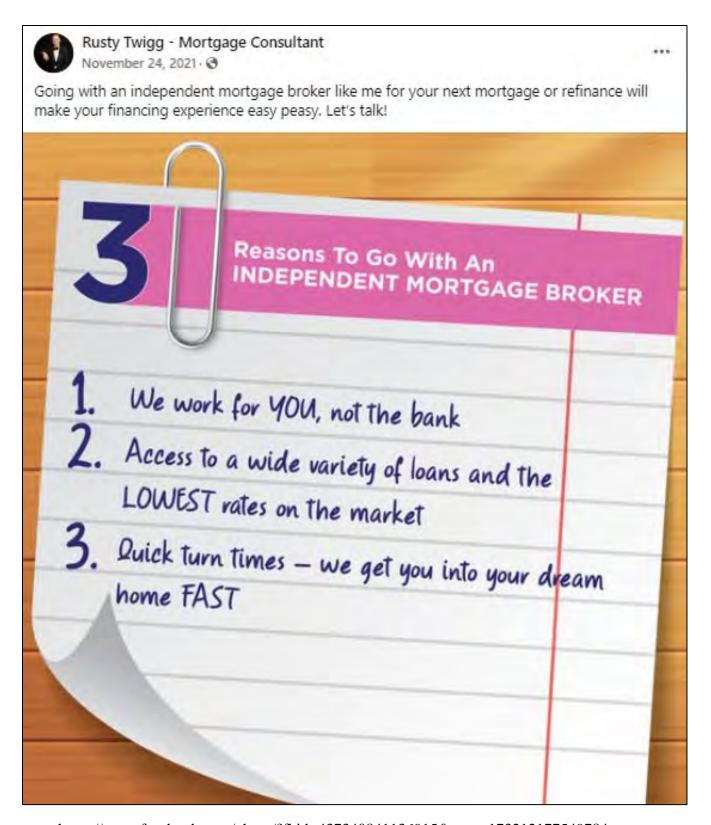
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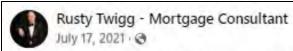
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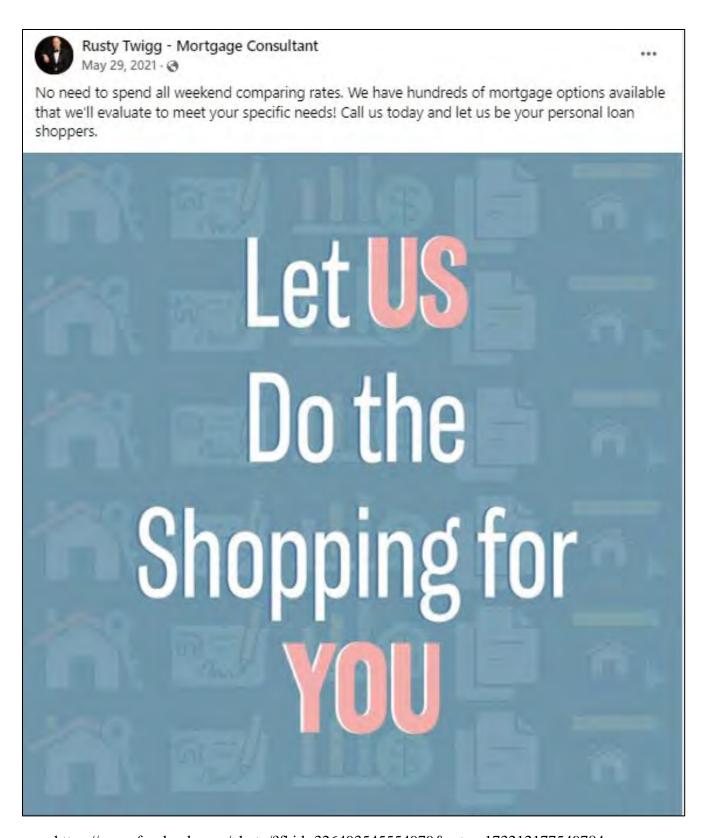
Working with an independent mortgage broker gives you access to tools, technology and service you won't find at a big bank. That's because we're mortgage experts focused exclusively on helping you get into your dream home. Call today!

THE INDEPENDENT MORTGAGE BROKER DIFFERENCE:

- Great rates and exclusive programs
- Close in as soon as 15 days
- Lock in your interest rate while you shop
- Expert advice



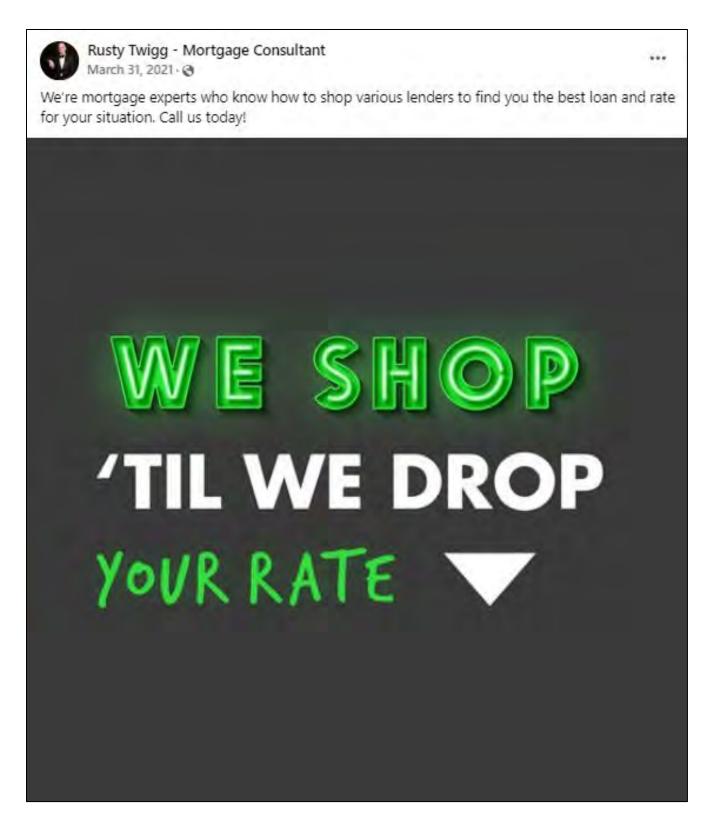
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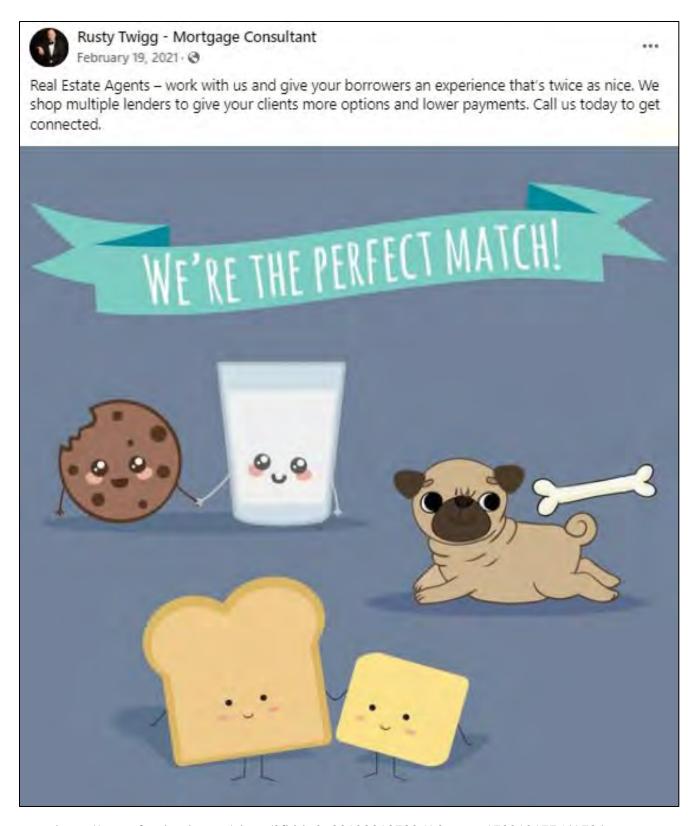
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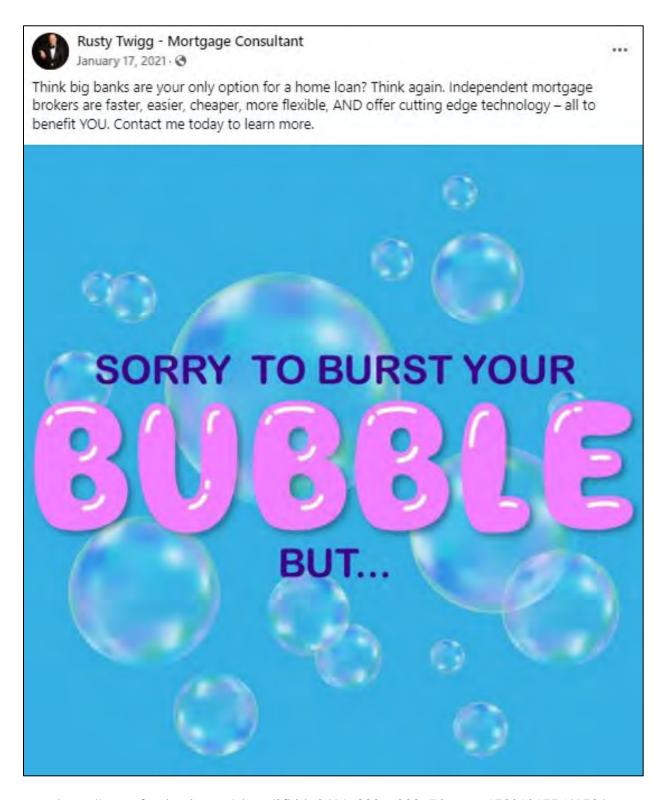
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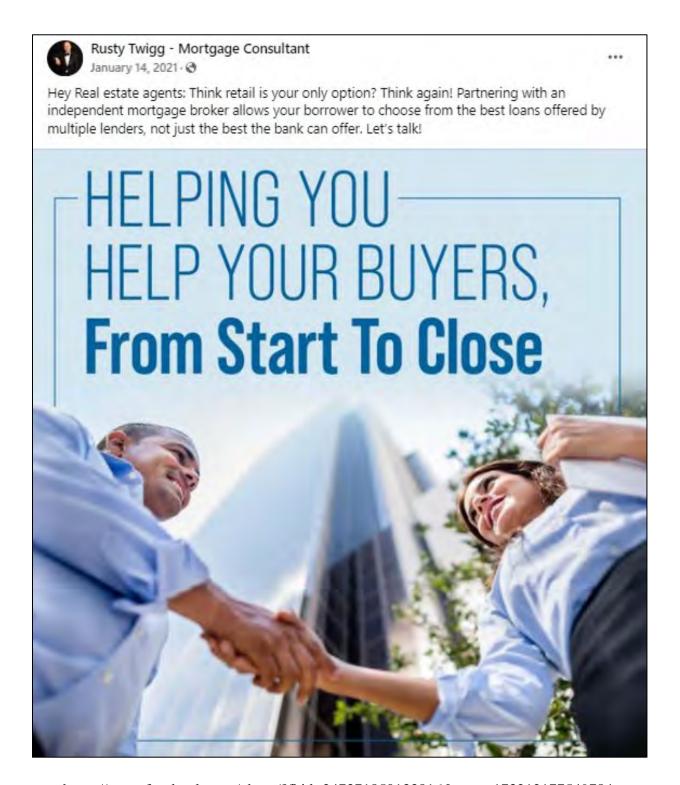
Looking for a house for the first time? I can help! Your dream home will be one of a kind – the same should go for your mortgage. Ditch cookie cutter options and let me help you find the perfect options for your income, area, credit, and more. Reach out today.



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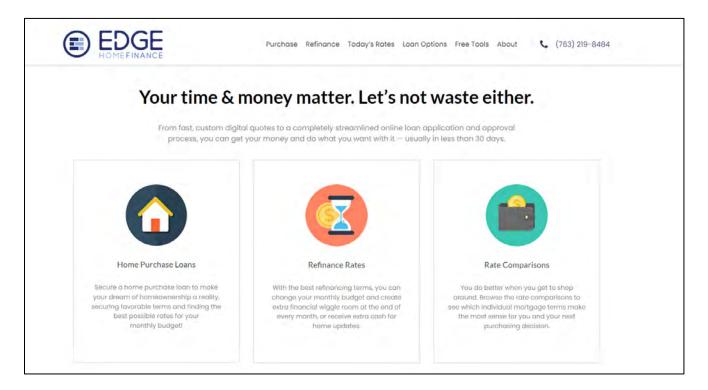


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CLIENTS PROMISE

Our primary responsibilities are to preserve our clients' financial values and to help them achieve their financial goals. We exercise careful diligence to ensure that they enjoy the benefits of the most knowledgeable resources in all areas of their financial management.

https://www.hantzgroup.com/about/



https://edgehomefinance.com/

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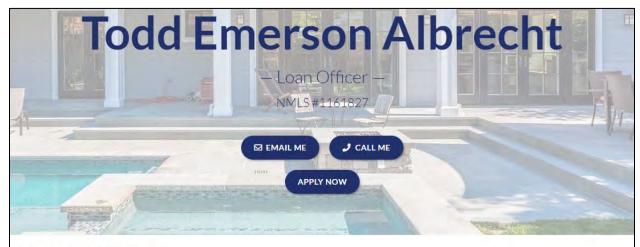
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https://edgehomefinance.com/buy/



A LITTLE ABOUT ME

Welcome to my website

Licensed In: AK, AL, AR, AZ, CA, CO, CT, DE, FL, GA, HI, ID, IO, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MT, NC, ND, NH, NM, NV, NJ, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, WA, WI, WV & WY NMLS #891464 Arizona Mortgage Broker License #MB-1007405 Massachusetts's license #MB891464 Todd NMLS 1161827 Edge NMLS 891464 Branch NMLS 2477112

Whether you're buying, selling, refinancing, or building your dream home, you have a lot riding on your loan specialist. Since market conditions and mortgage programs change frequently, you need to make sure you're dealing with a top professional who is able to give you quick and accurate financial advice. I have the expertise and knowledge you need to explore the many financing options available.

Ensuring that you make the right choice for you and your family is my ultimate goal. And I am committed to providing my customers with mortgage services that exceed their expectations. I hope you'll browse my website, check out the different loan programs I have available, use my decision-making tools and calculators, and apply for a loan in just four easy steps with the short form Application.

After you've applied, I'll call you to discuss the details of your loan, or you may choose to set up an appointment with me using my online form. As always, you may contact me anytime by phone, fax or email for personalized service and expert advice.

https://edgehomefinance.com/team-member/todd-albrecht/

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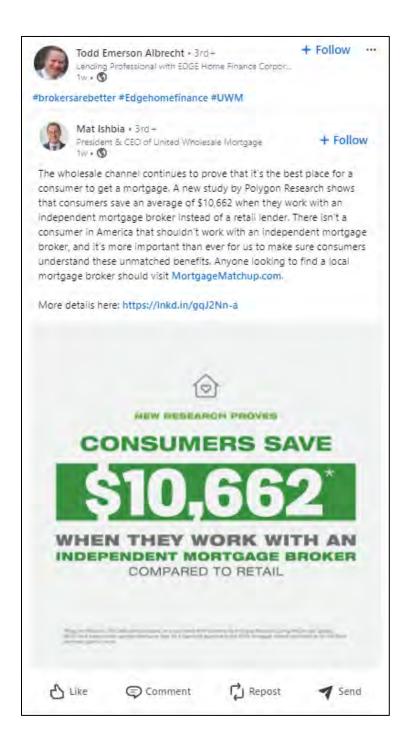
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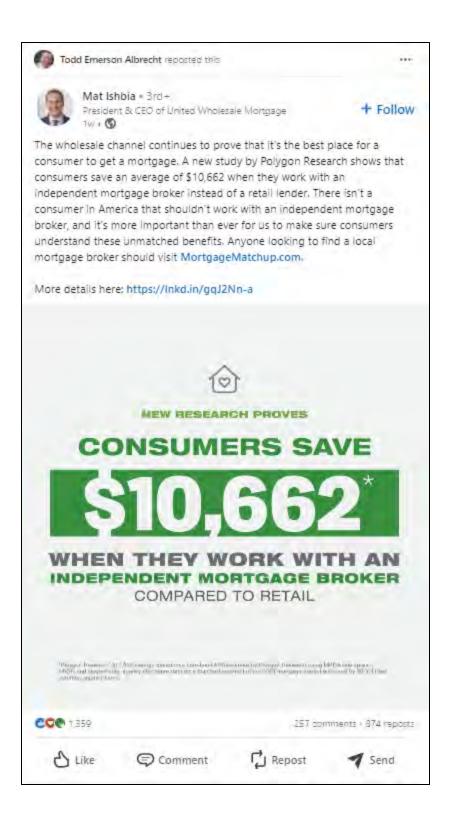
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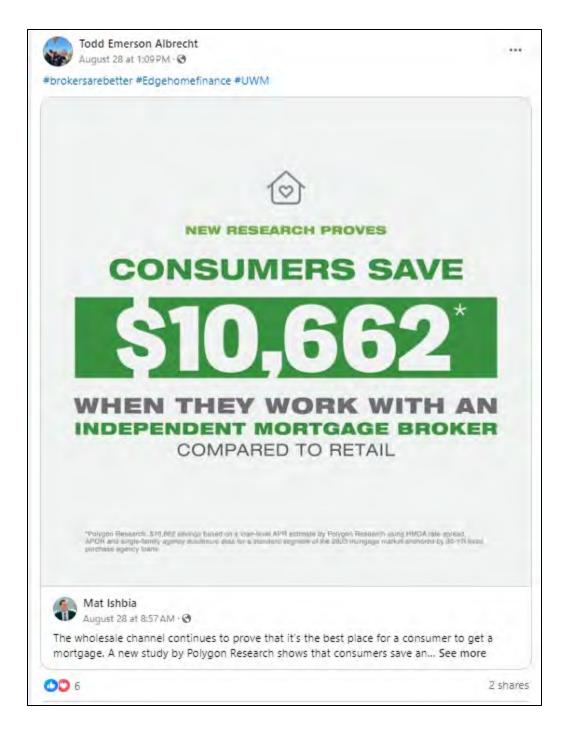
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ABOUT LOAN PRONTO

less is so much more

Loan Pronto has developed a digital mortgage process that streamlines your experience, thus saving you time, money, and a lot of paper.

(view service locations

simple is so much better

IT'S NOT A SECRET THAT MOST PEOPLE WOULD DESCRIBE THEIR MORTGAGE EXPERIENCE AS A NEVER-ENDING CYCLE OF CONFUSION, ANXIETY, AND SCANNER TROUBLES. THE REAL SECRET IS THAT IT DOESN'T HAVE TO BE THAT WAY.

We started Loan Pronto because we wanted to make refinancing or purchasing your home as easy as it should be. By leveraging the speed and efficiency of digital platforms, we make getting a loan faster, less expensive and less invasive, without sacrificing the personal service that helps put your concerns at ease. Basically, we make it simple because it should be.

who we are

AS LENDING PROFESSIONALS WITH YEARS OF EXPERIENCE, WE GOTTIRED OF SEEING SO MANY WELL-QUALIFIED BORROWERS BE SHUT OUT OF THE MARKET BY A PROCESS THAT WAS UNNECESSARILY COMPLICATED.

So, we decided to take our expertise and match it with the latest in online tools and automation. We wanted to finally deliver a mortgage process that didn't leave qualified candidates scrambling to get to the finish line

The result is an easy-to-use digital platform that can get your mortgage needs handled faster with fewer expenses, allowing us to offer the lowest rates and fees in the industry.

DRIVEN AND COMPETITIVE We do what it takes to become world-class, and we use those skills to compete against and beat the competition. ENTREPRENEURIAL We are innovative, we believe every problem has a solution, and we never do anything because it has always been done that way. HONEST AND ETHICAL We do what is right even when nobody is watching. RESOURCEFUL We believe in working smarter, not harder, and we use all toots at our disposal to find the out-of-the-box solution. EVERY CUSTOMER, EVERY TIME Relationships are the lifeblood of our business, and we place focus on our client's needs HAVE FUN We believe that if we have fun, our customers will too!

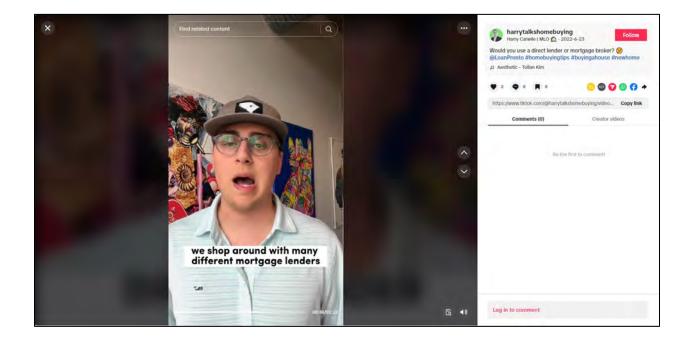


expert help

Our experienced loan consultants will take the time to understand your needs and help find the perfect mortgage for you.

CHAT WITH AN EXPERT

https://loanpronto.com/loan-options/



https://www.tiktok.com/@harrytalkshomebuying/video/7112531472178908462

Appendix B

Loan Officer Name	Total Number of UWM Loans Brokered	Total Value of UWM Loans Brokered	Total Number of Loans Brokered Across All Lenders	UWM Funneling Rate
Loan Officer 1	472	\$128,637,339	576	82%
Loan Officer 2	234	\$57,668,965	254	92%
Loan Officer 3	183	\$46,499,717	183	100%
Loan Officer 4	229	\$48,055,599	240	
Loan Officer 5	240	\$57,190,446	318	75%
Loan Officer 6	195	\$43,296,139	196	99%
Loan Officer 7	156	\$38,428,942	204	76%
Loan Officer 8	148	\$31,377,116	151	98%
Loan Officer 9	146	\$30,427,887	148	99%
Loan Officer 10	135	\$42,839,558	163	83%
Loan Officer 11	127	\$24,377,254	164	77%
Loan Officer 12	124	\$21,664,749	124	100%
Loan Officer 13	115	\$27,722,781	127	91%
Loan Officer 14	103	\$34,250,441	129	80%
Loan Officer 15	100	\$19,665,506	117	85%
Loan Officer 16	89	\$20,669,873	99	90%
Loan Officer 17	85	\$23,291,014	109	78%
Loan Officer 18	76	\$15,026,983	79	96%
Loan Officer 19	75	\$15,745,344	76	99%
Loan Officer 20	75	\$14,920,854	75	100%
Loan Officer 21	75	\$12,886,296	93	81%
Loan Officer 22	74	\$15,530,203	74	100%
Loan Officer 23	69	\$12,815,835	75	92%
Loan Officer 24	68	\$12,549,619	73	93%
Loan Officer 25	62	\$15,797,337	73	85%
Loan Officer 26	48	\$9,258,913	50	96%
Loan Officer 27	47	\$10,378,895	53	89%
Loan Officer 28	43	\$9,108,350	52	83%
Loan Officer 29	41	\$7,091,266	48	85%
Loan Officer 30	41	\$6,885,519	43	95%
Loan Officer 31	40	\$12,813,098	45	89%
Loan Officer 32	39	\$7,279,117	45	87%
Loan Officer 33	39	\$8,596,016	41	95%
Loan Officer 34	37	\$6,656,162	40	93%
Loan Officer 35	35	\$7,651,895	41	85%
Loan Officer 36	35	\$6,110,701	44	80%
Loan Officer 37	35	\$6,993,077	36	97%
Loan Officer 38	29	\$6,437,766	38	76%
Loan Officer 39	27	\$5,844,327	34	79%
Loan Officer 40	26	\$7,597,263	27	96%
Loan Officer 41	26	\$6,036,073	29	
Loan Officer 42	25	\$5,612,953	30	
Loan Officer 43	24	\$6,425,761	28	
Loan Officer 44	22	\$6,217,138	28	
Loan Officer 45	21	\$3,988,238	27	78%
Unique LOs	# UWM Loans	\$ UWM Loans		
45	4135	\$958,318,325		